



PUBLIC DISCLOSURE

October 2, 2017

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Fidelity Bank
Charter Number 706081

100 East English Street
Wichita, Kansas 67202

Office of the Comptroller of the Currency

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Wichita, Kansas 67226

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

Institution’s CRA Rating: This institution is rated **Satisfactory**.

The following table indicates the performance level of Fidelity Bank with respect to the Lending, Investment, and Service Tests:

Performance Levels	(Name of Depository Institution) Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	
Low Satisfactory			X
Needs to Improve			
Substantial Noncompliance			

* The lending Test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- Fidelity’s lending activity demonstrated a good responsiveness to community credit needs. The overall geographic distribution of loans by income level of the geography is adequate. The overall distribution of loans to borrowers of different income levels is good. The level of community development (CD) lending had a significantly positive impact on lending performance.
- Fidelity demonstrated a good level of qualified community development investments and grants that are responsive to AA credit and community needs. The level of statewide and broader regional investments had a significantly positive impact on investment test performance in Kansas; and
- Fidelity’s delivery systems are reasonably accessible to essentially all geographies and individuals of different income levels. The bank provides an overall adequate level of CD services.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

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 MA/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: 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; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family

households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full 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, loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.)

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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 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 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.

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 MA/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. 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 it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

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.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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.

Rated Area: A rated area is a state or multi-state 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 multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan 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 One 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.

Description of Institution

Fidelity Bank (Fidelity) is a \$2.03 billion interstate stock thrift financial institution headquartered in Wichita, Kansas. The bank is a wholly owned subsidiary of Fidelity Financial Corporation, Wichita, Kansas, a holding company with \$244 million in assets. The bank has no affiliates requiring consideration for CRA activities.

Fidelity is a full-service banking institution that offers a broad range of banking services. This includes services to commercial enterprises of all sizes as well as to individual customers. Fidelity offers commercial, real estate, and consumer credit products, with the bank's primary lending activities focusing on residential real estate mortgage lending and small business lending. Fidelity Bank also has an active loan servicing portfolio among its business lines. As of June 30, 2017, net loans and leases represent 77.66 percent of the bank's total assets. The bank's \$1.58 billion loan portfolio consisted of 84.52 percent real estate loans, 8.09 percent consumer loans, and 6.43 percent commercial and industrial loans and .96 percent other loans. Tier One Capital totaled \$215.80 million. The bank operates in Kansas and Oklahoma.

Since the prior CRA evaluation, Fidelity acquired a branch of Bank SNB, National Association, Stillwater, Oklahoma. The branch is located in Overland Park, Kansas. As a result of this acquisition, Johnson County was designated as an assessment area for Fidelity on April 28, 2014. There are three assessment areas (AAs), with two in Kansas and one in Oklahoma. There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its communities. We last evaluated Fidelity's CRA performance on April 11, 2014. The bank received an overall rating of "Satisfactory".

Fidelity operates 21 full service branches, 21 deposit-taking Automated Teller machines (ATMs), and 37 Interactive Banking Machines (IBMs) in Kansas and Oklahoma. The IBMs take deposits and are video interactive with the customer. After hours the IBM transitions to a traditional ATM. Fidelity has 14 branches in Kansas and 7 branches in Oklahoma. Within Kansas, 13 branches are located in the Sedgwick County (Sedgwick) AA, and 1 branch is located in the Johnson County (Johnson) AA. The remaining 7 branches are located in the Cleveland/Oklahoma Counties (Cleveland/Oklahoma) AA.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We analyzed loans originated from January 1, 2014 through December 31, 2016. The evaluation period for CD loans and the Service and Investment Tests was April 12, 2014 to October 2, 2017. Lending activity in 2014 through 2016 was evaluated against 2015 HMDA Aggregate Peer Mortgage Data (HMDA), 2015 Peer Small Business Data – Aggregate Lending (business data), and 2010 U.S. Census Bureau data on the distribution of families or owner-occupied housing units, as applicable. Peer Data for 2016 was not available for comparison as of the date of this evaluation.

The evaluation of lending products included home mortgage loans, small business loans, and CD loans. Bank-wide, loans reportable under HMDA represented 78.6 percent of HMDA and CRA reportable loans (small loans to businesses) combined. CRA reportable loans represented 21.4 percent. Analyses were not conducted for any loan product unless Fidelity originated/purchased at least 20 loans within the AA. The bank did not originate or purchase a sufficient volume of multifamily loans in any AA to perform a meaningful analysis. There are no small loans to farms so this loan type is not included in the lending analysis. Each AA was evaluated with proportionate weight assigned to its primary lending product.

Data Integrity

The bank reported data is accurate and reliable. Prior to this evaluation, we conducted a data integrity examination to test the accuracy of the data reported by the bank. There have not been any changes to systems and controls.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, a sample of assessment areas (AAs) within that state was selected for full-scope reviews. Refer to the “Scope” section under each State Rating section (as applicable) for details regarding how the areas were selected.

Ratings

The bank’s overall rating is a blend of state ratings. Performance in the State of Kansas received the most weight in the overall rating. The Federal Deposit Insurance Corporation’s (FDIC) Summary of Deposits dated June 30, 2016, reflects that the Sedgwick AA accounts for 81.6 percent of Fidelity’s deposits and 69.6 percent of the offices. Seventy percent of lending during the evaluation period occurred within the Sedgwick AA.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.28(c) or §195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, 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 Kansas

CRA Rating for Kansas¹:	Satisfactory
The lending test is rated:	High Satisfactory
The investment test is rated:	High Satisfactory
The service test is rated:	Low Satisfactory

The major factors that support this rating include:

- Fidelity's lending activity demonstrated good responsiveness to credit needs. The distribution of loans by income level of the geography is adequate. The distribution of loans to borrowers of different income levels and businesses of different sizes is good. CD lending had a significant positive impact on the bank's lending test.
- Fidelity demonstrated a good responsiveness to community development investments needs.
- Fidelity's delivery systems are reasonably accessible to essentially all individuals living in geographies of different income levels in the assessment area. Bank employees provided an adequate level of CD services.

Description of Institution's Operations in Kansas

Fidelity has two AAs in the state. The AAs consist of the Sedgwick AA which is part of the Wichita MA #43620, and the Johnson AA which is part of the Kansas City MA #28140. The Sedgwick AA is the bank's largest AA in the state of Kansas. As of December 31, 2016, Fidelity operates 14 branches in the State of Kansas. All but one branch is located in the Sedgwick AA, with one branch in the Johnson AA.

Total deposits in the State of Kansas as of June 30, 2016 was \$1.35 billion. Branches in the Sedgwick AA held deposits of \$1.29 billion as of June 30, 2016. This places Fidelity third in deposit market share in the Sedgwick AA, with 10.29 percent of all deposits.

Refer to the Market Profiles for the State of Kansas in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

¹ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Scope of Evaluation in Kansas

Fidelity's two AAs located in the State of Kansas held 85.78 percent of the bank's total deposits and originated 87.64 percent of all loans during the evaluation period. Therefore, the State of Kansas will receive the most weight in the overall CRA rating.

We performed a full-scope review of the Sedgwick AA. This AA held 81.6 percent of Fidelity's deposits in Kansas and originated 79.90 percent of all loans originated during the evaluation period. We weighted home mortgage lending more heavily than small business lending, as these products represented 83.3 percent of the number and 82.5 percent of the dollar volume of all loans originated in the AA during the evaluation period. Additionally, we weighted home purchase and home refinance lending heavier than home improvement, as these products represented the majority of all home mortgage loans originated during the evaluation period.

We performed a limited-scope review of the Johnson County AA. We did not identify any significant variances in the bank's performance in the limited-scope AA to warrant expanding our review. Refer to the table in Appendix A for additional information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Kansas is rated "High Satisfactory". Based on a full-scope review, the bank's performance in the Sedgwick AA is good.

Lending Activity

Refer to the State of Kansas section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Lending levels reflect good responsiveness to individuals and businesses in the AA in relation to area credit needs and the bank's deposit market share. As of June 30, 2016, Fidelity ranked third in the Sedgwick County AA with a deposit share of 10.29 percent.

Home mortgage lending activity volumes are good. The bank originated 3,168 loans totaling \$462 million to borrowers in the AA during the evaluation period. Home purchase loans are the bank's primary HMDA product in the Sedgwick AA. The lending level for home purchase loans reflects an excellent responsiveness to credit needs in the AA. The most recent market share data (2015) for home purchase lending reflects that Fidelity was ranked 1st in the market with 9.26 percent of the total dollar volume in the AA during 2015 and 1st in the market with the number of loans at 9.20 percent.

Business lending activity in the AA is good. The most recent market share data (2015) for lending to small businesses reflects that Fidelity was ranked 11th in the market with 8.00 percent of the total dollar volume in the AA during 2015 and 2.57 percent of the number of

loans. The institution originated 633 loans totaling \$98 million to small businesses between January 1, 2014 and December 31, 2016.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans by income level of the geography is adequate.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the state of Kansas section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

The geographic distribution of home mortgages is adequate. In evaluating the geographic distribution of home loans in the Sedgwick AA, it is important to note that, according to the 2010 U.S. Census data, low-income census tracts contained 3.75 percent (4,795 units) of the total owner-occupied housing units in the AA. Of the total housing units in low-income geographies, rental and vacant units account for 52.11 percent and 20.43 percent respectively. Based on these statistics, the bank has limited opportunities for home mortgage lending in low-income census tracts. As a result, greater emphasis was placed on the bank's performance in moderate-income geographies when determining the overall geographic distribution conclusion for home mortgage loans.

Fidelity's geographic distribution of home purchase loans in the Sedgwick AA is adequate. The percentage of loans located in low-income geographies was significantly below the percentage of owner-occupied units. Fidelity's penetration in the low-income tracts exceeds the percentage of aggregate HMDA data for home purchase loans. The bank's percentage of loans in moderate-income geographies was below the percentage of owner-occupied units in this geography. Performance for loans originated for moderate-income census tracts is near the percentage of aggregate HMDA lending.

The geographic distribution of home refinance loans is good. The percentage of loans in low-income geographies was significantly below the percentage of owner-occupied units in these tracts. The bank's performance in low-income geographies is below the percentage of aggregate HMDA data for home refinance loans. The percentage of loans in moderate-income geographies is near to the percentage of owner-occupied units in these tracts. The bank's performance in moderate-income geographies exceeds the percentage of aggregate HMDA lending for home refinance loans.

The geographic distribution of home improvement loans is poor. The percentage of loans in low- and moderate-income geographies was significantly below the percentage of owner-occupied units in those tracts. Fidelity's market share for low- and moderate-income census tracts was below the percentage of aggregate HMDA lending for this loan type.

Small Loans to Businesses

Overall, the geographic distribution of small loans to businesses is adequate.

Refer to Table 6 in the state of Kansas section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The percentage of loans made in low-income geographies is near the percentage of businesses in those geographies. The bank's performance in low-income geographies is near the percentage of aggregate lending data for small loans to businesses. The percentage of loans made in moderate-income geographies is below the percentage of businesses in those geographies. The bank's performance in the moderate-income geographies is below the percentage of aggregate lending data.

Lending Gap Analysis

We analyzed Fidelity's home mortgage lending activity over the evaluation period to identify gaps in the geographic distribution of loans. We did not identify any unexplained gaps. The bank's AAs consist of whole geographies, meets the requirements of the regulation, and does not arbitrarily exclude any low- and moderate-income (LMI) areas.

Inside/Outside Ratio

This ratio is a bank-wide calculation and is not calculated by individual AA. Analysis is limited to bank originations and purchases, and does not include any affiliate data. For the evaluation period, Fidelity made a majority of all loan products by number, inside its AAs (65.98 percent). The percentage in number of loans made inside the AAs by loan type are as follows: home purchase (64.96 percent), home refinance (57.43 percent), home improvement (77.88 percent), and small businesses (76.87 percent). Fidelity's business strategy of originating mobile home loans provided by a third-party impacts the inside/outside analysis since a majority of these loans are to borrowers outside of the AAs. These purchased loans represent 26 percent of the loans outside of the AA for home purchase loans.

Distribution of Loans by Income Level of the Borrower

Fidelity's distribution of loans to borrowers of different income levels and businesses of different sizes is good. Good performance was evidenced in overall home mortgage loans. Small loans to businesses was very poor.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans is good. In performing our analysis, we considered the level of families below the poverty level, as well as the general affordability of housing to low- to moderate-income borrowers.

Refer to Tables 8, 9 and 10 in the state of Kansas section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

In evaluating the borrower distribution of home loans in the Sedgwick County AA, we noted that 13.13 percent of the families in the AA (2010 U.S. Census) are below the poverty level. In addition, we considered the average age of housing inventory and the median housing value in the AA. According to the 2010 U.S. Census, the average age of housing inventory was 57 years, with a median housing value of \$116,537. It should be noted that older housing often has higher maintenance costs compared to new housing inventory and frequently requires significant repairs to bring the dwelling up to code requirements. These older houses are often less energy efficient, resulting in higher utility costs, which can increase homeownership costs. These additional factors and costs can affect the ability of low- and moderate-income individuals to qualify for mortgage loans.

The bank's distribution of home purchase loans is good. The percentage of loans to low-income borrowers was below the percentage of low-income families. Performance for home purchase loans to low-income borrowers was near to the percentage of aggregate HMDA lending. The percentage of loans made to moderate-income borrowers exceeded the percentage of moderate-income families and was excellent. Performance for loans to moderate-income borrowers was near to the percentage of aggregate HMDA data for home purchase loans.

The borrower distribution of home mortgage refinance loans is good. The percentage of loans to low-income borrowers was below the percentage of low-income families. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families. The bank's performance with loans to low- and moderate-income borrowers exceeds the percentage of aggregate HMDA data for home mortgage refinance loans.

The borrower distribution of home improvement loans is poor. The percentage of loans to low- and moderate-income borrowers was significantly below the percentage of low- and moderate-income families. The bank's performance with loans to low-income borrowers was below the percentage of aggregate HMDA data for home improvement loans. The percentage of loans to moderate-income borrowers was below the percentage of aggregate HMDA data for this loan type.

Small Loans to Businesses

The overall borrower distribution of small loans to businesses is very poor.

Refer to Table 11 in the state of Kansas section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Fidelity's overall distribution of small loans to businesses with gross revenues of \$1 million or less is very poor. The bank's performance is significantly below the percentage of businesses in the AA. The percentage of loans to small businesses was significantly below the aggregate lending data. Sixty eight percent of the small loans to businesses were \$100 thousand or less.

Community Development Lending

Refer to Table 1 Lending Volume in the state of Kansas section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

CD lending had a significant, positive impact on lending performance in the Sedgwick AA. During the evaluation period, Fidelity originated 57 CD loans totaling \$46.1 million or 26.47 percent of Tier One Capital allocated to the Sedgwick AA.

Specific examples of CD loans originated during the evaluation period include:

- Forty-nine loans totaling \$4.5 million for affordable housing. These loans were primarily to a community organization that builds new homes and rehabilitates existing homes for LMI families. This entity is a State of Kansas certified Community Housing Development Organization (CHDO).
- Three loans totaling \$6 million provided economic development by creating or retaining jobs for LMI individuals.
- Four loans totaling \$33.7 million were to revitalize and stabilize. These loans helped redevelop an area in the City of Wichita's Project Downtown redevelopment plan.
- A \$2 million loan was used to construct medical and dental offices which provide healthcare to primarily low-income families.

Product Innovation and Flexibility

Fidelity offers home mortgage products that are flexible. These include various products designed to facilitate home ownership for LMI borrowers. These programs include the Federal Housing Administration (FHA), the Veteran's Administration (VA), and the U.S. Department of Agriculture/Rural Development (USDA). These programs offer borrowers an opportunity to obtain home financing on more flexible terms like lower down payment requirements, seller paying closing costs, down payment flexibility, and qualifying with a lower credit score. VA and USDA loans allow 100 percent financing.

Fidelity offers an innovative home mortgage program with the FHA 203k program. This program facilitates the simultaneous purchase and renovation of the home. The funds for rehabilitation are escrowed and managed by Fidelity. During the evaluation period, Fidelity originated 1,520 flexible or innovative home loans totaling \$229 million in the AA and \$13 million outside the AA. Since October 2016, Fidelity began offering the Equity Builder Home Loan program. This is a fixed rate home loan with no down payment requirements. To date, Fidelity has originated one home loan for \$95 thousand to a LMI individual with this program. Fidelity also provides flexible loan servicing options through loss mitigation and modification programs such as Freddie Mac's Home Affordable Modification Program (HAMP). The bank also partners with the Small Business Administration (SBA) to originate small business loans.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited-scope review, the bank's performance under the lending test for Johnson AA is not inconsistent than the bank's overall performance in the state, and had no CD loans. Performance in the limited-scope AA did not have an impact on the overall Lending Test rating for the state. Refer to the Tables 1 through 13 in the state of Kansas section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Kansas is rated High Satisfactory. Based on the full-scope review, the bank's performance in the Sedgwick County AA is good.

Refer to Table 14 in the state of Kansas section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Based on a full-scope review, Fidelity's performance in the Sedgwick AA is rated Low Satisfactory. The bank provided an adequate level of qualified community development investments and grants in the AA given the level of opportunities.

During the community development period of April 12, 2014 through October 2, 2017, (the CD evaluation period), Fidelity provided the AA with 21 qualified current investments and grants totaling \$5.2 million. Investments represent 2.99 percent of the AA's allocated June 30, 2017, Tier One Capital. Fidelity's investments are targeted primarily to revitalize and stabilize a low-income census tract located in a redevelopment area by providing mixed income housing. Other investments include grants made to community service organizations that provide services primarily to LMI individuals.

- Investment of \$4.8 million to revitalize and stabilize a blighted low-income geography, and funds are specifically targeted to an apartment project.
- One grant for \$101 thousand is for the purpose of economic development to a new program, which provides mentors and capital funding for start-up and other businesses.
- Grants totaling \$269 thousand are to various organizations to provide health care, special needs services, social services, and community service needs to LMI children and families. Services include advocacy, parenting, shelter, education, and mentoring.

Investments – Kansas Statewide

When considering the investments made in the greater Kansas statewide area, the bank's performance in Kansas is High Satisfactory. Fidelity entered into two new commitments to invest \$5 million in a regional low-income housing tax credit (LIHTC) equity fund. This entity has a purpose, mandate, or function that includes serving the bank's AAs. Unfunded commitments for investments in LIHTC funds that are unconditional, legally binding, and committed to during the current evaluation period are considered as current period investments. Fidelity investments in Kansas represent 4.79 percent of allocated Tier One Capital.

Conclusions for Area Receiving Limited-Scope Reviews

Based on the limited-scope review, the bank's performance under the investment test in the Johnson AA is not inconsistent with the bank's overall performance in the state. Refer to Table 14 in the state of Kansas section of Appendix D for the facts and data that support these conclusions. While there were no investments in the Johnson AA, the investments made in the greater Kansas statewide area were considered.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Kansas is rated "Low Satisfactory". Based on the full-scope review, the bank's performance in the Sedgwick AA is adequate.

Retail Banking Services

Refer to Table 15 in the state of Kansas section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Fidelity's branch distribution in the Sedgwick AA is adequate. Branches are reasonably accessible to essentially all geographies and individuals of different income levels. The bank has one branch in low-income tracts in the AA. The percentage of branches in the low-income geographies exceeds the percentage of population living in these geographies. The bank has four branches in moderate-income geographies. The percentage of branches in moderate-income geographies is well below the percentage of population living in these geographies.

The bank did not open any new branches in the Sedgwick AA during the evaluation period. The bank closed three Wal-Mart branches. Of the closed branches, one was located in a moderate-income tract, while the other two were in a middle- and an upper-income tract. Delivery systems for low- and moderate-income census tracts have generally not been adversely affected.

Fidelity's hours and services offered throughout the AA do not vary in a way that inconveniences portions of the AA, particularly low- to moderate-income geographies or individuals. Services offered and hours of operation are comparable among locations regardless of the income level of the geography.

Management compliments its traditional service delivery methods with certain alternative delivery processes, including ATMs, IBMs, an interactive telephone banking service, internet banking service, a free mobile banking application that also allows mobile deposit. Another delivery service available is mobile wallet that allows payment via Apple Pay, Samsung Pay, and Android Pay at the merchant's point of sale, if enabled. Customers can also access cash at Fidelity ATM via cardless cash rather than using an ATM card. Fidelity debit cards can be used at any ATM or merchant that accepts VISA. These delivery methods provide increased access to banking services throughout all areas in the AA. ATM metrics show the ATMs in the moderate-income tract have twice the activity as an ATM in a middle-income tract. We did not

place significant weight on these alternative delivery systems, as the bank did not maintain metrics to determine their effectiveness in helping to meet the service and credit needs of the LMI individuals.

Community Development Services

Fidelity's performance in providing CD services in the Sedgwick AA is adequate. The bank's efforts demonstrated an adequate responsiveness and commitment to community needs by providing technical assistance on financial and banking related matters to community groups, plus low- and moderate-income persons and families. Two of the services focused on affordable housing. Fidelity provided expertise from 18 employees to six different organizations during the evaluation period.

- Federal Home Loan Bank of Topeka Partnership – Funds are acquired from the Affordable Housing Program and then used through Mennonite Housing Rehabilitation Services, Inc. The funds are used to provide financing for owner-occupied and rental housing for LMI individuals. One bank employee assists with the applications to obtain the affordable housing subsidies. In addition bank employees provide loan servicing for the 49 loans. However, no hours were listed for the loan servicing.
- City of Wichita – Bank employees provide loan servicing for the Housing Department for 14 loans. These loans for affordable housing are targeted to LMI families within the city's Local Investment Areas within the targeted Neighborhood Revitalization Area. However, no hours were listed for the loan servicing.
- Hunter Health Clinic – One employee provided a leadership position by serving on the board. This entity provides health services for LMI individuals.
- Rainbows United – One employee provided a leadership position by serving as a board member. This entity provides social services and developmental training for special needs children in LMI families.
- Junior Achievement – Fourteen employees provided financial education to LMI students.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited-scope review, the bank's performance under the service test in the Johnson AA was weaker than the bank's overall "Low Satisfactory" performance under the Service Test in Kansas. The weaker performance was due to branch distribution and lack of community services in this AA.

State Rating

State of Oklahoma

CRA Rating for Oklahoma ² :	Needs to Improve
The lending test is rated:	Low Satisfactory
The investment test is rated:	Needs to Improve
The service test is rated:	Low Satisfactory

The major factors that support this rating include:

- Fidelity’s lending activity demonstrated an adequate responsiveness to community credit needs. The overall distribution of loans by income level of the geography is good. The overall distribution of loans to borrowers of different income levels and businesses of different sizes is adequate. Community development loans had a neutral impact on the rating.
- Fidelity demonstrated a poor responsiveness to CD investments needs in the AA given the level of opportunities.
- Fidelity’s delivery system are reasonably accessible to essentially all portions of LMI geographies. Alternative delivery systems provide additional access to bank services for LMI geographies. CD services was adequate during the evaluation period.

Description of Institution’s Operations in Oklahoma

Fidelity has one AA in the state. The Cleveland/Oklahoma AA is part of the Oklahoma City MA #36420. As of June 30, 2016, the bank ranked 24th in deposit market share in the Cleveland/Oklahoma AA with 0.91 percent of all deposits.

Refer to the Market Profiles for the State of Oklahoma in Appendix C for detailed demographics and other performance context information.

Scope of Evaluation in Oklahoma

Fidelity’s branches in the Cleveland/Oklahoma AA held 14.94 percent of the bank’s total deposits and originated 18.81 percent by dollar and 12.36 percent by number of HMDA and CRA loans during the evaluation periods. Therefore, the State of Oklahoma will not receive as much weight as the State of Kansas in the overall CRA rating.

² For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution’s performance in that area.

We performed a full-scope review on the Cleveland/Oklahoma AA. We weighted home mortgage lending slightly more than small business lending, as these products represented 55.95 percent of the number and 61.74 percent of the dollar of loans originated in the AA during the evaluation period. Small business loans represented 44.05 percent by number and 38.26 percent by dollar originated in the AA during the evaluation period. Additionally we weighted home purchase and home refinance lending heavier than home improvement lending, as these products represented the majority of all home mortgage loans originated during the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OKLAHOMA

LENDING TEST

The bank's performance under the lending test in the Cleveland/Oklahoma AA is rated "Low Satisfactory".

Lending Activity

Lending levels reflect adequate responsiveness to businesses and individuals in the AA in relation to area credit needs and the bank's deposit market share.

Refer to Table 1 Lending Volume in the state of Oklahoma section of Appendix D for the facts and data used to evaluate the bank's lending activity.

As of June 30, 2016, Fidelity ranked 24th in the Cleveland/Oklahoma AA with a deposit share of 0.91 percent. In relationship to deposit share, home mortgage lending activity volumes reflect poor responsiveness to assessment area credit needs. The institution originated 329 loans totaling \$93 million to borrowers in the AA during the evaluation period. The 2015 HMDA data reflects that Fidelity ranked 63rd in the AA for home purchase loans with a market share of 0.26 percent based on total dollar amounts. The bank was ranked 50th for home refinance with a 0.39 percent market share based on total dollar amounts.

Business lending activity in the AA is adequate. The 2015 business data for CRA reportable business loans reflects that Fidelity was ranked 24th in the market with 0.49 percent of the number and 1.92 percent of the total dollar volume of loans. The institution originated 259 small business loans totaling \$58 million to businesses between January 1, 2014 and December 31, 2016.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans by income level of geography is good.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the state of Oklahoma section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

For the evaluation period, Fidelity's overall geographic distribution of home mortgage loans in the AA is good. In evaluating the geographic distribution of home loans in the Cleveland/Oklahoma AA, it is important to note that, according to the 2010 U.S. Census data, low-income census tracts contained 34.08 percent (9,773 units) of the total owner-occupied housing units in the AA. Of the total housing units in low-income geographies, rental and vacant units account for 47 percent and 19 percent, respectively. Based on these statistics, the bank had limited opportunities for home mortgage lending in low-income census tracts. As such, greater emphasis was placed on the bank's performance in moderate-income geographies when determining the overall geographic distribution conclusion for home mortgage loans.

The bank's geographic distribution of home purchase loans is adequate. The percentage of loans in the low-income geographies was significantly below the percentage of owner occupied units in these geographies. The portion of loans made in moderate-income geographies was below the percentage of owner-occupied units in these geographies. The bank's percentage of loans in low-income census tracts was significantly below the aggregate HMDA lending data for the geography. The bank's percentage of loans in moderate-income census tracts exceeds the aggregate HMDA lending data for the geography.

The geographic distribution for home refinance loans is excellent. The percentage of loans in low- and moderate-income geographies exceeds the percentage of owner-occupied units in these geographies. The bank's market share in low- and moderate-income census tracts exceeds the aggregate HMDA lending data for the geography.

The bank's geographic distribution of home improvement loans is very poor. The bank did not make any home improvement loans in low- or moderate-income geographies during the evaluation period. Home improvement loans were not significantly weighted as very few loans were originated during the evaluation period.

Fidelity had a low volume of home improvement and multifamily loans for the assessment period, so these areas will not significantly impact the lending conclusion.

Small Loans to Businesses

Overall, the geographic distribution of small loans to businesses is excellent.

Refer to Table 6 in the state of Oklahoma section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

During the evaluation period, Fidelity's overall geographic distribution of small loans to businesses in the AA is excellent. For low-income tracts, the bank's percentage of small loans

to businesses is near to the business data. For moderate income-tracts, the bank's percentage of small loans to businesses exceeds the business data. Regarding market share, the bank's market share in low-income tracts was near to the aggregate lending data and exceeds the aggregate lending data in moderate-income tracts.

Lending Gap Analysis

We analyzed Fidelity's home mortgage lending activity over the evaluation period to identify gaps in the geographic distribution of loans. We did not identify any unexplained gaps. The bank's AAs consist of whole geographies, meet the requirements of the regulation, and do not arbitrarily exclude any low- and moderate-income (LMI) areas.

Inside/Outside Ratio

This ratio is a bank-wide calculation and is not calculated by individual AA. Analysis is limited to bank originations and purchases, and does not include any affiliate data. For the evaluation period, Fidelity made a majority of all loan products by number, inside its AAs (65.98 percent). The percentage in number of loans made inside the AAs by loan type are as follows: home purchase (64.96 percent), home refinance (57.43 percent), home improvement (77.88 percent), and small businesses (76.87 percent). Fidelity's business strategy of originating mobile home loans provided by a third-party impacts the inside/outside analysis since a majority of these loans are to borrowers outside of the AAs. These purchased loans represent 26 percent of the loans outside of the AA for home purchase loans.

Distribution of Loans by Income Level of the Borrower

Fidelity's overall distribution of loans by income level of the borrower during the evaluation period is adequate.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans is poor. In performing our analysis, we considered the level of families below the poverty level, as well as the general affordability of housing to low- to moderate-income borrowers.

Refer to Tables 8, 9 and 10 in the state of Oklahoma section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The borrower distribution of home mortgage loans is adequate. In evaluating the borrower distribution of home loans in the Cleveland/Oklahoma AA, we noted 14 percent of the families in the AA (2010 U.S. Census) are below the poverty level. In addition, we considered the average age of the housing inventory and the median housing value in the AA. According to the 2010 U.S. Census, the average age of the housing inventory was 53 years, with a median housing value of \$123,529. Older housing often has higher maintenance costs compared to new housing inventory and frequently requires significant repairs to bring the dwelling up to code requirements. These older houses are often less energy efficient, resulting in higher utility

costs, which can increase homeownership costs. These additional factors and costs can affect the ability of low- and moderate-income individuals to qualify for mortgage loans.

The bank's distribution of home purchase loans during the evaluation period is good. The percentage of loans to low-income borrowers was significantly below the percentage of low-income families. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families. For low-income tracts, the bank's percentage of home purchase loans was below the aggregate HMDA lending data. For moderate-tracts, the bank's percentage of home purchase loans exceeds the aggregate HMDA lending data.

The bank's distribution of home refinance loans during the evaluation period is very poor. The percentage of loans to low-income borrowers was significantly below the percentage of low-income borrowers. The percentage of loans to moderate-income borrowers was significantly below the percentage of moderate-income borrowers. The bank's percentage of loans to low-income borrowers was significantly below the aggregate HMDA lending data. The bank's percentage of loans to moderate-income borrowers was significantly below aggregate HMDA lending data.

The bank's distribution of home improvement loans during the evaluation period is very poor. The percentage of loans to low-income borrowers was significantly below the percentage of low-income borrowers and well below the aggregate HMDA lending data. The bank did not make any home-improvement loans to moderate-income borrowers during the evaluation period. Home improvement loans were not significantly weighted as very few loans were originated during the evaluation period.

Small Loans to Businesses

The overall borrower distribution of small loans to businesses is adequate.

Refer to Table 11 in the state of Oklahoma section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The borrower distribution of small loans to businesses is adequate. The percentage of small business loans was below the percentage of small businesses. However, the percentage of loans to small businesses slightly exceeds the aggregate HMDA lending data. Additionally, 70 percent of all loans to businesses were below \$250 thousand in size.

Community Development Lending

Refer to Table 1 Lending Volume in the state of Oklahoma section of Appendix D for the facts and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

CD lending has a neutral impact on lending performance in the Cleveland/Oklahoma AA. During the evaluation period, Fidelity originated one CD loan totaling \$467.5 thousand. This

affordable housing loan was to refinance a 24 unit apartment building located in a moderate-income census tract that primarily serves LMI individuals in the Cleveland/Oklahoma AA.

Product Innovation and Flexibility

Fidelity offers home mortgage products that are flexible. These include various products designed to facilitate home ownership for LMI borrowers. These programs include the Federal Housing Administration (FHA), the Veteran's Administration (VA), and the U.S. Department of Agriculture/Rural Development (USDA). These programs offer borrowers an opportunity to obtain home financing on more flexible terms like lower down payment requirements, seller paying closing costs, down payment flexibility, and qualifying with a lower credit score. VA and USDA loans allow 100 percent financing.

Fidelity offers an innovative home mortgage program with the FHA 203k program. This program facilitates the simultaneous purchase and renovation of the home. The funds for rehabilitation are escrowed and managed by Fidelity. During the evaluation period, Fidelity originated 53 flexible or innovative home loans totaling eight million dollars in the AA and \$13 million outside of the AA. Since October 2016, Fidelity began offering the Equity Builder Home Loan program. This is a fixed rate home loan with no down payment requirements. Fidelity also provides flexible loan servicing options through loss mitigation and modification programs such as Freddie Mac's Home Affordable Modification Program (HAMP). The bank also partners with the Small Business Administration (SBA) to originate small business loans.

INVESTMENT TEST

The bank's performance under the Investment Test in Oklahoma is rated Needs to Improve.

Refer to Table 14 in the state of Oklahoma section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

The bank provided a poor level of qualified CD investments and grants in the AA given the level of opportunities. Fidelity provided the AA with three qualified current investments and donations totaling \$4.5 thousand. Total qualifying investments represent 0.01 percent of the AA's allocated June 30, 2017, Tier One Capital. The donations during the evaluation period were made to community service organizations that provide services to primarily LMI individuals.

SERVICE TEST

The bank's performance under the service test in Oklahoma is rated Low Satisfactory.

Retail Banking Services

Refer to Table 15 in the State of Oklahoma section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Fidelity's branch distribution in the Cleveland/Oklahoma AA is adequate. Branches are reasonably accessible to essentially all portions of low- and moderate-income geographies. The bank has one branch in low-income geographies and one in a moderate-income geography in the AA. However, the bank's branches are adjacent to several low- and moderate-income tracts and have several more low- and moderate-income tracts within a few miles. The percentage of branches in low-income geographies exceeds the population and moderate-income geographies, but is below the percentage of population living in these geographies. Bank ATMs and IBMs are located at the branch locations.

The bank did open one new branch in the Cleveland/Oklahoma AA during the evaluation period. The branch was opened in a moderate income tract; however, it did not have full retail services available during the entire evaluation period. The bank is currently finishing construction of a retail service area on the first floor of the office building.

Fidelity offers traditional services at all of the retail branches in the Cleveland/Oklahoma AA. Hours and services offered throughout the AA do not vary in a way that inconvenience portions of the AA, particularly low- to moderate-income geographies or individuals. The bank has six ATMs and two IBMs located at their six retail branches, seven of which are deposit taking. While Fidelity's branches are accessible to limited portions of low- and moderate-income geographies, the bank provides several alternative delivery systems. These systems included a retail banking and mortgage servicing call center, telephone banking, online banking, mobile banking, and ATM/debit cards. The telephone, online, and mobile banking are available 24 hours a day. Mobile banking also includes Apple Pay, Samsung Pay, Android Pay and mobile check deposit.

Community Development Services

Fidelity's performance in providing CD services in the Cleveland/Oklahoma AA is adequate. The bank serviced 319 loans totaling \$19 million at no charge for the Central Oklahoma Habitat for Humanity. The bank also serviced 286 loans totaling \$17 million at a reduced rate for loans that belonged to the Central Oklahoma Habitat for Humanity but were sold to MetaFund Corporation. Hours were not tracked for these services but due to the unusual characteristics of the loans, it uses significant resources to service the loans.

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 metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (excludes CD loans): 01/01/2014 to 12/31/2016 Investment and Service Tests and CD Loans: 04/12/2014 to 10/02/2017	
Financial Institution	Products Reviewed	
Fidelity Bank (Fidelity) Wichita, Kansas	Home Mortgage Loans, Small Loans to Businesses, Community Development Loans, Investments, and Services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Not Applicable (NA)	NA	NA
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
State of Kansas Sedgwick County part of MA #48620	Full-Scope	
Johnson County part of MA #28140	Limited-Scope	
State of Oklahoma Cleveland/Oklahoma Counties part of MA #36420	Full-Scope	

Appendix B: Summary of Multistate Metropolitan Area and State Ratings

RATINGS FIDELITY BANK				
	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Overall Bank:				
Fidelity Bank	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
Multistate Metropolitan Area or State:				
State of Kansas	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
State of Oklahoma	Low Satisfactory	Needs To Improve	Low Satisfactory	Needs To Improve

(*) The lending test is weighted more heavily than the investment and service tests in the overall rating.

Appendix C: Community Profiles for Full-Scope Areas

State of Kansas Full-Scope Area

Sedgwick Assessment Area

Demographic Information for Full Scope Area: Sedgwick County						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	124	9.68	33.87	25.81	30.65	0.00
Population by Geography	498,365	7.42	30.47	27.40	34.72	0.00
Owner-Occupied Housing by Geography	127,710	3.75	25.88	28.86	41.50	0.00
Business by Geography	25,619	12.59	23.10	27.50	36.81	0.00
Farms by Geography	838	2.98	13.60	31.03	52.39	0.00
Family Distribution by Income Level	125,002	21.25	18.14	20.81	39.80	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	49,235	11.36	45.57	25.24	17.83	0.00
Median Family Income		61,402	Median Housing Value	116,537		
FFIEC Adjusted Median Family Income for 2016		65,000	Unemployment Rate	3.92%		
Households Below Poverty Level		13%	(2010 US Census)			

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

Source: 2010 US Census and 2016 FFIEC updated MFI

The Sedgwick AA lies within the Wichita MA #48620. Wichita is the largest city located in Sedgwick County, Kansas. The Sedgwick AA consists of 12 low-income, 42 moderate-income, 32 middle-income, and 38 upper-income tracts. The percentage of households and families living below the poverty level are 13.13 percent and 10.41 percent respectively.

Moderate competition for financial services exists within the institution’s AA, which includes nationwide and regional banks. According to the FDIC market share data as of June 30, 2016, there are 41 institutions operating in this market with 169 banking offices. Fidelity ranks third in the market with 10.29 percent market share. Significant competitors include Bank of America, and INTRUST Bank. These two institutions represent 49.65 percent of total deposits in the AA.

Fidelity’s deposits in the AA total 1.29 billion, representing 81.59 percent of total bank deposits and 84.68 percent of deposits in the state of Kansas as of June 30, 2016. Fidelity operates 13 full service branches in the Sedgwick AA. The institution supplements its branch network with 15 deposit-taking ATMs and 33 deposit-taking IBMs.

Employment and Economic Factors

The June 2017 economic analysis for Wichita prepared by Moody’s Analytics reflects slow improvements with the housing market strengthening in the year ahead. The median sales price of new and existing homes has risen over this horizon. Recovery is also evidenced by the declining trend in unemployment. According to the Bureau of Labor Statistics, the September 2017 unemployment rate for Sedgwick County was 3.8 percent (unadjusted); favorable compared to the national unemployment rate of 4.2 percent. The Wichita MA unemployment rate for September 2017 was 4.0.

Manufacturing is the leading employment industry in Wichita. Manufacturing accounts for 17.4 percent of total employment. Specifically, the aviation industry continues to drive the Wichita economy. The manufacturing of aerospace products and parts accounts for nearly 10 percent of overall employment, the highest share in the nation. Major aviation companies include Spirit AeroSystems Inc., the top employer in both the metro area and the state, Textron Aviation (Beechcraft, Cessna, and Hawker), Bombardier Learjet, and Boeing Integrated Defense Systems. Other key employment industries include educational and health services, government, professional and business services, and retail trade. These industries account for 14.9 percent, 13.7 percent, 11.3, and 11.1 percent of total employment, respectively.

Housing

Prices have escalated since the 2010 U.S. Census noted the median housing value was \$116.5 thousand. Based on the American Community Survey (ACS), the median value for existing homes in Sedgwick County is \$126.5 thousand. ACS notes the median selected monthly owner costs with a mortgage are estimated at \$1.2 thousand for the AA. Using median family income, low-income individuals would have \$753 a month to allocate to housing and homeownership opportunities are limited. This assumes allowing 30 percent of their income for housing. The limited opportunities for residential lending in low- and moderate-income geographies are also evident based on 2010 census data. Low-income geographies consist of 52.11 percent rental units and 20.43 percent vacant properties. Within moderate-income tracts, 40.47 percent were rental units and 11.85 percent were vacant properties.

Community Contact

We contacted a community contact that identified affordable housing as a need in the area. The nonprofit organization is dedicated to revitalizing, stabilizing, and reinvesting in Wichita, Kansas neighborhoods. This organization provides below market rate rentals, and new homes for LMI individuals. Federal Home Loan Bank Affordable Housing Program funds are used for home repair and City of Wichita Home Fund provides down payment assistance. This contact specifically mentioned Fidelity as participating in the construction loans for new homes. The contact noted opportunities with LIHTC as bank investments, volunteers for committees, and down payment assistance programs.

State of Oklahoma Full-Scope Area

Cleveland/Oklahoma Assessment Area

Demographic Information for Full-Scope Area: Cleveland/Oklahoma AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	303	10.23	28.71	34.32	25.41	1.32
Population by Geography	974,388	7.00	27.14	36.40	29.33	0.13
Owner-Occupied Housing by Geography	235,994	4.14	21.07	40.16	34.63	0.00
Businesses by Geography	71,196	6.62	21.39	34.45	35.97	1.57
Farms by Geography	1,597	3.51	18.72	36.63	40.83	0.31
Family Distribution by Income Level	235,467	22.17	17.93	20.04	39.87	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	94,411	11.48	38.95	35.50	14.07	0.00
Median Family Income	= \$62,862	Median Housing Value		= \$123,529		
FFIEC Adjusted Median Family Income for 2016	= \$63,700	Unemployment Rate (2010 US Census)		= 3.07%		
Households Below the Poverty Level	= 14%					

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2010 U.S. Census and 2016 FFIEC updated MFI

The Cleveland/Oklahoma AA lies with the Oklahoma City MA #36420. Oklahoma City is the largest city in the state, with portions of the city in both counties. The Cleveland/Oklahoma AA consists of 31 low-income, 87 moderate-income, 104 middle-income, and 77 upper-income tracts, with 4 tracts unclassified. The percentage of households and families living below the poverty level are 14.3 percent and 11.8 percent respectively.

Strong competition for financial services exists within the bank’s AA, which includes nationwide and regional banks. According to FDIC market share data as of June 30, 2016, there are 59 FDIC insured financial institutions with 312 offices including Fidelity. Fidelity ranks 24th in deposit share with 0.91 percent deposit market share. Significant competitors include JPMorgan Chase Bank, BOKF, and MidFirst Bank. These top three institutions in the market represent 41.50 percent of total deposits in the AA.

Fidelity’s deposits in the AA total \$237 million, representing 1.49 percent of total bank deposits as of June 30, 2016. As of December 31, 2016, Fidelity operates seven branches in the Cleveland/Oklahoma AA. The bank supplements its branch network with five deposit-taking ATMs and two deposit-taking IBMs.

Employment and Economic Factors

The July 2017 economic analysis for Oklahoma City prepared by Moody’s Analytics reflects an improving economy although momentum has slowed due to the downturn in energy related

growth that started in 2014. Energy growth is projected to increase over the next year as higher-paying energy support service jobs return. Aerospace is also gaining prominence due to the continuance of tax credits and the presence of Tinker Air Force Base and the FAA's aeronautical center. The September 2017 unemployment rate (not seasonally adjusted) for Oklahoma City was 3.9 percent. This level is lower than the September 2017 national unemployment rate of 4.2 percent.

Government employment represents 21 percent of total employment in Oklahoma City MA. Education and health services, professional and business services, leisure and hospitality services, and retail trade represent 14.5 percent, 12.6 percent, 11 percent, and 10.9 percent, respectively, of employment in the Oklahoma City MA. The largest employers in the area are Tinker Air Force Base, University of Oklahoma, FAA Aeronautical Center, Integris Health, and Hobby Lobby Stores representing 24,000, 12,700, 7,000, 6,000, and 5,100 employees, respectively.

Housing

Prices have escalated since the 2010 U.S. Census noted the median housing value was \$123.5 thousand. Based on the ACS, the median value for existing homes in Cleveland County is \$163.3 thousand, and in Oklahoma County is \$149.7 thousand in 2016. ACS notes the median selected monthly owner costs with a mortgage are estimated at \$1.3 thousand for the AA. Using the median family income, low-income individuals would have \$770 a month to allocate to housing and homeownership opportunities are limited. This assumes allowing 30 percent of their income for housing. The limited opportunities for residential lending in low- and moderate-income geographies are also evident based on 2010 census data. Low-income geographies consist of 47.05 percent rental units and 18.87 percent vacant properties. Within moderate-income tracts, 44.47 percent were rental units and 15.06 percent were vacant properties.

Community Contact

During this evaluation, examiners reviewed contacts made with community and/or business organizations over the course of the evaluation periods. The community contact indicated that the primary credit needs for the AA were affordable housing, individual development accounts, small business development, and financial literacy programs. The contacts stated the banks in the area have been very responsive to banking needs; however, would like to see increased participation in dollars committed and the number of bank partnerships established. The contacts also stated that market volatility and competition from online lenders has made it difficult for local banks to compete.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. 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 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank, if applicable, over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.

- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.

Table 12. Borrower Distribution of Small Loans to Farms - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table 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 of households by income level in each MA/assessment area.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Tables of Performance Data

State of Kansas

Table 1. Lending Volume

LENDING VOLUME												
Geography: KANSAS												
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016												
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Sedgwick	91.17	3,168	462,214	633	98,041	0	0	57	46,137	3,801	560,255	95.92
Limited Review:												
Johnson	8.83	303	76,649	65	16,158	0	0	0	0	368	92,807	4.08

* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.
 ** The evaluation period for Community Development Loans is from April 12, 2014 to October 2, 2017.
 *** Deposit Data as of June 30, 2016. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: FIDELITY BANK (10000706081) (Included)

Table 2a. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE														
Geography: KANSAS														
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016														
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Sedgwick	2,629	93.23	3.75	1.79	25.88	16.43	28.86	27.88	41.50	53.90	1.61	18.72	28.42	51.24
Limited Review:														
Johnson	191	6.77	0.28	0.00	7.54	4.71	27.86	36.65	64.32	58.64	0.25	7.02	27.84	64.89

* Based on 2015 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3a. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT															
Geography: KANSAS															
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016															
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid
Full Review:															
Sedgwick	59	89.39	3.75	1.69	25.88	11.86	28.86	35.59	41.50	50.85	2.96	21.80	28.86	46.38	
Limited Review:															
Johnson	7	10.61	0.28	0.00	7.54	0.00	27.86	28.57	64.32	71.43	0.30	4.32	22.09	73.29	

* Based on 2015 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: FIDELITY BANK (10000706081) (Included)

Table 4a. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE														
Geography: KANSAS														
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016														
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Sedgwick	475	82.04	3.75	1.47	25.88	23.79	28.86	21.05	41.50	53.68	1.84	18.45	29.26	50.45
Limited Review:														
Johnson	104	17.96	0.28	0.00	7.54	4.81	27.86	20.19	64.32	75.00	0.13	5.56	22.97	71.34

* Based on 2015 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: FIDELITY BANK (10000706081) (Included)

Table 5a. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY														
Geography: KANSAS														
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016														
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Sedgwick	5	83.33	14.03	20.00	36.40	20.00	33.38	60.00	16.18	0.00	32.00	36.00	20.00	12.00
Limited Review:														
Johnson	1	16.67	0.70	0.00	19.50	0.00	35.22	100.00	44.58	0.00	0.00	28.13	28.13	43.75

* Based on 2015 Peer Mortgage Data -- US and PR

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multi family housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Institution ID: FIDELITY BANK (10000706081) (Included)

Table 6a. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES														
Geography: KANSAS														
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016														
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*			
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Sedgwick	633	90.95	12.59	11.53	23.10	14.22	27.50	15.64	36.81	58.61	13.41	23.59	26.40	36.60
Limited Review:														
Johnson	63	9.05	0.55	3.17	9.00	12.70	23.24	14.29	63.90	69.84	0.51	9.61	21.22	68.66

* Based on 2015 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2016).

Table 7a. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS														
Geography: KANSAS														
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016														
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*			
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Sedgwick	0	0.00	2.98	0.00	13.60	0.00	31.03	0.00	52.39	0.00	0.00	5.83	39.81	54.37
Limited Review:														
Johnson	0	0.00	0.20	0.00	7.78	0.00	29.56	0.00	61.97	0.00	0.00	3.08	24.62	72.31

* Based on 2015 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2016).

Institution ID: FIDELITY BANK (10000706081) (Included)

Table 8a. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE														
Geography: KANSAS														
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016														
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families***	% BANK Loans****	% Families ³	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Sedgwick	2,629	93.23	21.25	10.83	18.14	25.23	20.81	26.35	39.80	37.59	11.43	25.27	26.62	36.69
Limited Review:														
Johnson	191	6.77	10.75	6.45	13.05	15.05	20.10	27.42	56.11	51.08	5.55	18.38	25.61	50.46

* Based on 2015 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 5.0% of loans originated and purchased by BANK.

3 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: FIDELITY BANK (10000706081) (Included)

Table 9a. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT														
Geography: KANSAS														
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016														
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families***	% BANK Loans****	% Families ⁴	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Sedgwick	59	89.39	21.25	8.77	18.14	8.77	20.81	19.30	39.80	63.16	12.16	17.34	25.92	44.58
Limited Review:														
Johnson	7	10.61	10.75	0.00	13.05	0.00	20.10	14.29	56.11	85.71	3.25	12.12	23.48	61.15

* Based on 2015 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 3.0% of loans originated and purchased by BANK.

⁴ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: FIDELITY BANK (10000706081) (Included)

Table 10a. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE														
Geography: KANSAS														
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016														
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families ***	% BANK Loans****	% Families ₅	% BANK Loans****	% Families ***	% BANK Loans****	% Families ***	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Sedgwick	475	82.04	21.25	12.18	18.14	23.22	20.81	23.22	39.80	41.38	8.48	21.89	26.29	43.34
Limited Review:														
Johnson	104	17.96	10.75	1.04	13.05	12.50	20.10	17.71	56.11	68.75	5.14	13.67	23.46	57.74

* Based on 2015 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 8.3% of loans originated and purchased by BANK.

5 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: FIDELITY BANK (10000706081) (Included)

Table 11a. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: KANSAS									
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016									
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Sedgwick	633	90.69	78.45	17.85	67.77	11.69	20.54	6,939	2,821
Limited Review:									
Johnson	65	9.31	82.22	63.08	33.85	29.23	36.92	12,622	5,817

* Based on 2015 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2016).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 3.30% of small loans to businesses originated and purchased by the bank.

Table 12a. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS									
Geography: KANSAS									
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016									
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Lending Data*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Sedgwick	0	0.00	96.54	0.00	0.00	0.00	0.00	103	41
Limited Review:									
Johnson	0	0.00	93.69	0.00	0.00	0.00	0.00	65	44

* Based on 2015 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2016).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: KANSAS									
Evaluation Period: April 12, 2014 TO October 2, 2017									
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Sedgwick	0	0	21	5,209	21	5,209	50.42	0	0
Limited Review:									
Johnson	0	0	0	0	0	0	0.00	0	0
Statewide Activity with P/M/F	1	123	2	5,000	3	5,123	49.58	3	5,073

* 'Prior Period Investment's' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Institution ID: FIDELITY BANK (10000706081) (Included)

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: KANSAS																	
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016																	
Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Sedgwick	95.92	13	100.00	7.69	15.39	46.15	30.77	0	3	0	-1	-1	-1	7.42	30.47	27.40	34.72
Limited Review:																	
Johnson	4.08	1	100.00	0.00	0.00	0.00	100.00	1	0	0	0	0	+ 1	0.68	10.13	28.43	60.75

Tables of Performance Data

State of Oklahoma

Institution ID: FIDELITY BANK (10000706081) (Included)

Table 1. Lending Volume

LENDING VOLUME												
Geography: OKLAHOMA												
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016												
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Cleveland/Oklahoma	100.00	329	93,423	259	57,892	0	0	1	468	588	151,315	100.00

* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from April 12, 2014 to December 31, 2016.

*** Deposit Data as of June 30, 2016. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: FIDELITY BANK (10000706081) (Included)

Table 2a. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE														
Geography: OKLAHOMA														
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016														
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Cleveland/Oklahoma	192	100.00	4.14	0.52	21.07	17.19	40.16	30.73	34.63	51.56	1.23	16.05	36.47	46.25

* Based on 2015 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3a. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT														
Geography: OKLAHOMA														
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016														
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Cleveland/Oklahoma	21	100.00	4.14	0.00	21.07	0.00	40.16	38.10	34.63	61.90	3.64	17.91	43.13	35.32

* Based on 2015 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: FIDELITY BANK (10000706081) (Included)

Table 4a. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE														
Geography: OKLAHOMA														
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016														
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Cleveland/Oklahoma	104	100.00	4.14	5.77	21.07	24.04	40.16	21.15	34.63	49.04	1.66	13.64	36.93	47.78

* Based on 2015 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: FIDELITY BANK (10000706081) (Included)

Table 5a. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY														
Geography: OKLAHOMA														
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016														
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Cleveland/Oklahoma	12	100.00	6.09	8.33	43.00	58.33	31.03	25.00	19.88	8.33	3.20	48.00	28.00	20.80

* Based on 2015 Peer Mortgage Data -- US and PR

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multifamily Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6a. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES														
Geography: OKLAHOMA														
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016														
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*			
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Cleveland/Oklahoma	258	100.00	6.62	6.20	21.39	22.48	34.45	26.74	35.97	44.57	7.07	19.80	32.82	40.31

* Based on 2015 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2016).

Institution ID: FIDELITY BANK (10000706081) (Included)

Table 7a. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS														
Geography: OKLAHOMA														
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016														
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*			
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Cleveland/Oklahoma	0	0.00	3.51	0.00	18.72	0.00	36.63	0.00	40.83	0.00	2.50	10.63	52.50	34.38

* Based on 2015 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2016).

Table 8a. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE														
Geography: OKLAHOMA														
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016														
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families***	% BANK Loans****	% Families ₆	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Cleveland/Oklahoma	192	100.00	22.17	6.17	17.93	22.22	20.04	16.67	39.87	54.94	7.99	21.71	25.18	45.12

* Based on 2015 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 15.6% of loans originated and purchased by BANK.

6 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9a. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT														
Geography: OKLAHOMA														
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016														
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families***	% BANK Loans****	% Families ⁷	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Cleveland/Oklahoma	21	100.00	22.17	5.26	17.93	0.00	20.04	5.26	39.87	89.47	10.12	19.10	27.10	43.68

* Based on 2015 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 9.5% of loans originated and purchased by BANK.

⁷ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: FIDELITY BANK (10000706081) (Included)

Table 10a. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE														
Geography: OKLAHOMA														
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016														
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families***	% BANK Loans****	% Families ₈	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Cleveland/Oklahoma	104	100.00	22.17	3.39	17.93	5.08	20.04	13.56	39.87	77.97	7.31	17.35	22.87	52.47

* Based on 2015 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 43.3% of loans originated and purchased by BANK.

8 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: FIDELITY BANK (10000706081) (Included)

Table 11a. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: OKLAHOMA									
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016									
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Cleveland/Oklahoma	259	100.00	83.57	47.49	52.51	17.76	29.73	17,748	8,158

* Based on 2015 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2016).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 14.29% of small loans to businesses originated and purchased by the bank.

Institution ID: FIDELITY BANK (10000706081) (Included)

Table 12a. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS									
Geography: OKLAHOMA									
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016									
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Lending Data*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Cleveland/Oklahoma	0	0.00	95.55	0.00	0.00	0.00	0.00	161	123

* Based on 2015 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2016).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

Institution ID: FIDELITY BANK (10000706081) (Included)

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: OKLAHOMA									
Evaluation Period: April 12, 2014 TO October 2, 2017									
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Cleveland/Oklahoma	0	0	3	5	3	5	100.00	0	0

* 'Prior Period Investment's' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Institution ID: FIDELITY BANK (10000706081) (Included)

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: OKLAHOMA																	
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016																	
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branch-es	% of Rated Area Branch-es in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Cleveland/Oklahoma	100.00	7	100.00	14.29	14.29	14.29	57.14	1	0	0	+1	0	0	7.00	27.14	36.40	29.33