



2024

Corporate Responsibility Report

Corporate responsibility

At BOK Financial, we reimagine what's possible in the pursuit of better every day with our clients, our teams, our business and our communities. That passion has fueled our work for more than a century, and our commitment to creating opportunity, stability and success burns brighter than ever.

Although we began in 1910 as a local source of capital for the energy industry, we've grown to become one of the strongest, most vibrant financial institutions in the country, fueling economic growth and security across the American Midwest and Southwest, serving a broad spectrum of industries, institutions, and individuals across the country. But even as we grow, the deep ties to the communities we serve drive our support of initiatives related to community advancement to levels well beyond the typical corporate commitments to education and job training in both size and scope.

Additionally, our majority shareholder and chairman of the board, George Kaiser, initiates and funds major programs directed toward these purposes, further amplifying our corporate commitment. Mr. Kaiser created the George Kaiser Family Foundation whose mission is to create an environment where every family has an opportunity to succeed. As a signatory of the Giving Pledge, he has committed to giving the majority of his wealth—well exceeding the net income and value of the company—to philanthropic or charitable causes.

Our strong client focus, dedicated employees, community commitment and solid governance are just some of the factors that have driven the company's success in the past—and will no doubt enable another century of growth.



At BOK Financial, we know that the health of our company and ability to deliver sustained shareholder value are deeply connected to the wellbeing of our clients, employees and communities we serve. That knowledge—paired with our core values—informs the disciplined approach we take to managing, safeguarding and growing our company. And that disciplined ability to stay true to who we are and how we conduct ourselves drives our continued success.

In this corporate responsibility review, we explore just some of the ways that BOK Financial delivers returns to our stakeholders, whether that takes the form of our rigorous approach to risk management or our strategic approach to supporting local nonprofits. Hopefully, it demonstrates our commitment to making the right decision each and every day on big things and small things.

We recognize that our work as a responsible corporate citizen is never ending, and we embrace that. Our commitment to making a difference by serving with a purpose has never wavered since we were founded more than a century ago. I stand with our more than 5,000 employees in celebrating what we accomplished in 2024 and committing to continue doing even better in years to come.



A handwritten signature in black ink that reads "Stacy C. Kymes". The signature is fluid and cursive.

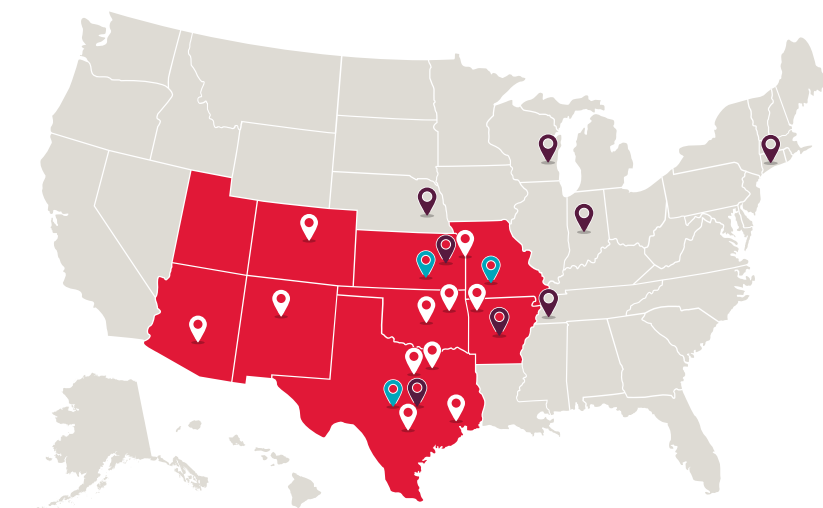
STACY C. KYMES
President & CEO

About us

BOK Financial is a top U.S.-based financial services company, offering sophisticated wealth, commercial, and consumer products and services. Still, we do business one client at a time, focused on delivering thoughtful expertise and tailored advice, because we know that when our clients succeed, we succeed.

CORPORATE SNAPSHOT

- NASDAQ: BOKF
- Top 30 national/regional bank
- Midwest/Southwest franchise
- 114 full-service locations across 8 states
- Seasoned management team
- Proven ability to deliver organic growth
- Consistent execution and strategy
- Long-term focused



Full service banking markets Additional wealth management offices Additional mortgage offices

Average loans (\$MM)

	2024	2023	2022
Commercial banking	\$20,202	\$19,375	\$17,553
Consumer banking	\$2,024	\$1,800	\$1,689
Wealth management	\$2,177	\$2,202	\$2,166

Average deposits (\$MM)

	2024	2023	2022
Commercial banking	\$16,752	\$15,321	\$18,323
Consumer banking	\$8,078	\$8,014	\$8,763
Wealth management	\$9,654	\$7,739	\$8,491

Fiduciary assets (\$MM)

2024	\$67,979
2023	\$59,799
2022	\$56,060

Assets under management or administration (\$MM)

2024	\$114,615
2023	\$104,737
2022	\$99,735

STRATEGIC PRIORITIES

- Accelerate top-line growth
- Manage risk
- Win as a talent magnet
- Advance technology

\$524MM

Net income in 2024

\$531 million net income in 2023
\$520 million net income in 2022

5,056

Full-time employees in 2024

4,966 full-time employees in 2023
4,791 full-time employees in 2022

Credit rating



BOKF, NA (Bank) - Long-term Issuer Credit Ratings



Community

As a financial services company with operations focused in eight states, we know how to think big, helping individuals and families, small businesses and large corporations succeed and thrive. But despite our regional presence and national capabilities, some of our most important work happens on a much smaller scale—with our neighbors and communities. We take our commitment to our communities seriously, being in the minority of banks to receive an Outstanding CRA rating with every review since 2013.

Through financial contributions and the generosity of our employees giving their time and talents, our company continues to make a significant impact in the communities we serve. We support initiatives that enhance educational opportunities in our communities, invest in economic development through our local chambers of commerce and teach financial education through our Learn for Life program.

We volunteer, serve on boards, and give financial support to a variety of organizations that serve the most vulnerable citizens in our communities by addressing issues in areas of basic needs, education and economic development.

See our most recent [Community Report](#) for additional information on the difference we're making in our communities.

Housing affordability

BOK Financial's community development lending supports the creation and retention of affordable housing, economic development, the revitalization/stabilization of low- to moderate-income (LMI) areas and organizations that provide community services for LMI individuals and families.

We have significantly contributed to affordable housing within the markets we serve through our community development investments. More than \$278 million of the \$402 million (approximately 69%) of the community development investment portfolio was in affordable housing as of Dec. 31, 2024.

Of the 1,513 affordable housing units developed over the past three years through these investment activities, 60% are in properties that incorporate on-site social services in support of tenant needs. Not only do these projects contribute to community stability, more than 40% of the units are in existing buildings repurposed with energy saving systems.

INVESTMENT YEAR	# OF AFFORDABLE HOUSING INVESTMENTS	TOTAL COMMITMENT	# OF AFFORDABLE HOUSING UNITS
2022	5	\$39,513,482	471
2023	6	\$47,029,231	826
2024	4	\$30,111,749	216
Total	15	\$116,654,462	1,513

OVER THE PAST TEN YEARS



\$502 million
in affordable housing
investments



\$1.1 billion
in loan funding to support
affordable housing projects

Small business & community development

LOANS DESIGNED TO PROMOTE SMALL BUSINESS AND SMALL FARMS

2022	1,579	\$556,254,000
2023	1,630	\$498,402,000
2024	1,389	\$444,050,000

LOANS DESIGNED TO PROMOTE COMMUNITY DEVELOPMENT

2022	94	\$567,741,000
2023	77	\$185,793,000
2024	86	\$385,156,000

Employee volunteering

Commitment to the communities we serve is a value shared with many of our employees, evidenced by the number who serve on boards, conduct financial education training and roll up their shirtsleeves to help.



59,000+ hours
of employees volunteering



412 employees
served on nonprofit boards
or committees

The company supports those efforts by providing each employee eight hours of paid volunteer time annually to support causes or organizations that are making a difference in the community, building key relationships and strategic partnerships that help drive our success. The volunteer hours given by our employees in 2024 equate to nearly \$2.1 million in making a difference in our communities.

BOK Financial is proud to be a certifying organization for the President’s Volunteer Service Award, which celebrates individual volunteerism and community service. In 2024, the company recognized 172 employees who volunteered 100 hours or more with various nonprofit organizations across our footprint. Our annual campaign combined corporate giving and employee contributions to generate more than \$3 million for local United Way organizations.

That commitment to volunteerism is led from the top of the company, with members of the executive leadership team serving on the boards of almost twenty different community organizations.

ELT MEMBER	NONPROFIT INVOLVEMENT
Scott Grauer	<ul style="list-style-type: none">Baker University Board of Trustees
Marty Grunst	<ul style="list-style-type: none">Junior Achievement of Oklahoma
Becky Keesling	<ul style="list-style-type: none">Emergency Infant ServicesInstitute of Internal AuditorsMissouri State University
Stacy Kymes	<ul style="list-style-type: none">Tulsa Community Foundation
Mindy Mahaney	<ul style="list-style-type: none">Leadership OklahomaFamily Safety CenterOklahoma Medical Research Foundation
Derek Martin	<ul style="list-style-type: none">Goodwill Industries of Tulsa
Marc Maun	<ul style="list-style-type: none">University of Tulsa - Collins School of BusinessDowntown Tulsa Partnership
Jeff Reid	<ul style="list-style-type: none">Oklahoma Center for Community and Justice
Brad Vincent	<ul style="list-style-type: none">Oklahoma Caring FoundationOklahoma State University Foundation Board of Governors
Mark Wade	<ul style="list-style-type: none">American Cancer SocietyFort Worth Colonial Charities, Inc
Kelley Weil	<ul style="list-style-type: none">Tulsa Regional ChamberPhilbrook Museum of Art



Employees

Our more than 5,000 team members are the bedrock of our success. We succeed through their diligence and support, collaboration and innovation. Ours is a culture that celebrates the individuality of each of our team members while fostering a collective spirit of tenacity, inspired action, ambition to win the right way and collaboration in everything we do.

Our focus on the importance of a highly engaged workforce allows us to attract and retain the finest talent in the industry. Our employee turnover rate remains below industry averages, supported by our commitment to internal mobility and the prevalence of company-sponsored learning opportunities.

The company was named a 2024 Gallup Exceptional Workplace Award winner for creating a culture that values employee engagement and well-being. The prestigious award is Gallup's top recognition for workplaces, celebrating just 60 companies globally that have a highly engaged and performance-driven workforce.

We were also recognized by Fair360 as one of the nation's top four regional companies. The rankings are based on company-submitted data in the areas of leadership accountability, human capital metrics, talent programs, workforce practices, supplier assessments and philanthropy.

BOK Financial's commitment to fairness in pay structures is central to our comprehensive compensation practices and policies. We evaluate our workforce to ensure that employees performing similar work at the same level have similar compensation opportunities.



Governance and ethics

As a financial services company, we understand the importance of trust. That's why unwavering integrity goes beyond a core value to simply being a part of how we evaluate everything we do. Our governance structure, prudent policies and active engagement with our employees underscore our commitment to always acting in the best interest of our clients, employees, communities and shareholders. Our Board consists of a substantial majority of independent directors. The average tenure of the 17 directors on our Board is 16 years.

Board oversight

The company's Board of Directors is composed of a group of strong leaders with executive experience that aligns with our organization's business strategy. Brief biographies for our board members and senior management can be found on the "[Our Leadership](#)" section of our investor relations website.

The board oversees the company's overall strategic and reputational risks and regularly reviews the company's credit, liquidity and operations, as well as the risks associated with each. Committees of the board focus on specific areas, including:

- **Audit Committee:** accounting and financial reporting, internal controls, and whistleblower complaints
- **Risk Committee:** risk management strategies, policies and practices that identify, assess, monitor and manage risk
- **Credit Committee:** credit and lending strategies and objectives
- **Compensation Committee:** compensation policies, programs and incentives

Business ethics

We provide annual training for all employees on our [Standards of Conduct](#), compliance management requirements, BSA/AML (Bank Secrecy Act/Anti-Money Laundering) processes, physical security, risk culture and internal controls, risk reporting and awareness, and information security awareness.

The Board of Directors is also required to adhere to the company's [Code of Ethics](#) in satisfaction of Section 406 of the Sarbanes-Oxley Act of 2002, the NASDAQ listing requirements and related regulations. As a national bank, each member of BOK Financial's Board of Directors affirms their commitment to uphold the organization's standards in its annual Oath of Office.

BOK Financial's Chief Compliance Officer oversees the enterprise compliance program and reports to the Chief Risk Officer. The compliance program includes policies and procedures, annual training requirements, monitoring and testing, annual risk assessments and a complaint management program.

Compliance staff actively monitor line of business activities and governance to determine compliance with applicable regulatory requirements. Monitoring processes identify, track, and report issues discovered in the lines of business through formal risk assessments.

Independent monitoring and risk assessments inform the scope of testing performed by Corporate Compliance Management and Internal Audit.

RELATED DOCUMENTS

Standards of Conduct

The Audit Committee of the Board of Directors annually reviews and approves the company's [Standards of Conduct](#) on which employees are annually trained and attest to. Each member of the Board of Directors takes an annual Oath of Office prescribed by the Office of the Comptroller of the Currency (OCC) and is bound by the company's [Code of Ethics](#).

Proxy Statement

The company's annual [proxy statement](#) identifies responsibilities of board committees.

10-K

The company's [10-K](#) reviews a wide array of company performance factors, including any legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behavior, market manipulation, malpractice, or other related financial industry laws or regulations.

Customer privacy

The ethical collection, use, sharing and retention of customer data is a requirement for building data trust. We believe creating data trust combines the elements of data privacy and data security. As such, the company's Chief Information Security Officer also serves as the Privacy Officer, and the privacy program is overseen by the Risk Committee of the Board.

The Privacy Officer is responsible for implementing privacy practices and ensuring compliance with applicable privacy regulations. We apply privacy-by-design in the development of our applications and establish processes to fulfill data requests from our customers.

Risk assessments are performed on an annual basis to evaluate the company's ability to protect customers' private information; risk results as well as the company's overall compliance status are reported to the Risk Committee.



About BOK Financial Corporation

BOK Financial Corporation is a regional financial services company headquartered in Tulsa, Oklahoma. The company's stock is publicly traded on NASDAQ under the Global Select market listings (BOKF). BOK Financial Corporation's holdings include BOKF, NA; BOK Financial Securities, Inc.; and BOK Financial Private Wealth, Inc. BOKF, NA operates TransFund and Cavanal Hill Investment Management. BOKF, NA operates banking divisions across eight states as: Bank of Albuquerque; Bank of Oklahoma; Bank of Texas and BOK Financial (in Arizona, Arkansas, Colorado, Kansas and Missouri); as well as having limited purpose offices in Nebraska, Wisconsin, Connecticut and Tennessee. Through its subsidiaries, BOK Financial Corporation provides commercial and consumer banking, brokerage trading, investment, trust and insurance services, mortgage origination and servicing, and an electronic funds transfer network. BOK Financial® is a registered trademark of BOKF, NA. For more information, visit www.bokf.com.

Forward-looking statements.

This review contains forward-looking statements that are based on management's beliefs, assumptions, current expectations, estimates and projections about BOK Financial Corporation, the financial services industry, the economy generally and the related responses of the government, consumers, and others, on our business, financial condition and results of operations. Words such as "anticipates," "believes," "estimates," "expects," "forecasts," "plans," "outlook," "projects," "will," "intends," variations of such words and similar expressions are intended to identify such forward-looking statements. These various forward-looking statements are not guarantees of future performance and involve certain risks, uncertainties, and assumptions which are difficult to predict with regard to timing, extent, likelihood and degree of occurrence. For a discussion of risk factors that may cause actual results to differ from expectations, please refer to BOK Financial Corporation's most recent annual and quarterly reports.

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