



## **PUBLIC DISCLOSURE**

June 5, 2023

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

UMB Bank, N.A.  
Charter Number: 23920

1010 Grand Avenue  
Kansas City, MO 64106

Office of the Comptroller of the Currency

Midsized Bank Supervision  
425 S. Financial Place, Suite 1700  
Chicago, IL 60605

**NOTE:** This document is an evaluation of this bank'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 bank. This evaluation is not, and should not be construed as, an assessment of the financial condition of this bank. The rating assigned to this bank 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

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

The following table indicates the performance level of **UMB Bank, National Association (UMB)** with respect to the Lending, Investment, and Service Tests:

Performance Levels	UMB Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	
High Satisfactory	X		X
Low Satisfactory			
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:

- The Lending Test rating is based primarily on the Outstanding performance in the state of Missouri and High Satisfactory performance in the Kansas City Combined Statistical Area (CSA), St. Louis Multi-State Metropolitan Statistical Area (MMSA), and the states of Arizona, Colorado, Kansas, Oklahoma, and Texas rating areas. UMB’s community development (CD) lending performance had a significantly positive impact in the rating areas.
- The Investment Test rating is based primarily on the Outstanding performance in the Kansas City CSA, St. Louis MMSA, and the states of Arizona, Colorado, Missouri, Nebraska, Oklahoma, and Texas rating areas. The bank exhibits excellent responsiveness to credit and economic development needs.
- The Service Test rating is based primarily on the Outstanding performance in the Kansas City CSA, and the High Satisfactory performance in the St. Louis MMSA and the state of Missouri rating areas. Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank’s assessment areas (AA).

### Product Innovation and Flexibility

In July 2021, the bank launched a secured credit card to extend credit to applicants who otherwise do not qualify for credit due to limited or no credit history. The product is flexible as it allows potential customers to establish or re-establish credit with no minimum credit score required to

qualify.

Additionally, the bank offers a Consumer Credit Card Thin-File program to customers. This credit card is innovative as it uses alternative underwriting requirements for individuals who do not have an established credit history.

In December 2021, the bank launched a first-time homebuyer down payment assistance program, which now extends to the bank's entire footprint, to make home loans more attainable for borrowers without sufficient resources to make a down payment. The loan-to-value (LTV) can go up to 100 percent, allows up to 5 percent equity grants, and eliminates private mortgage insurance. This product shows the bank's innovativeness and flexibility through its high LTV and equity grant ceilings and flexibility to provide an additional residential lending product.

The bank participated in the Paycheck Protection Program (PPP) upon its creation which required flexible and innovative underwriting to serve borrowers and keep abreast of changing guidelines. The bank trained and deployed more than 100 employees to approve and fund loans.

As part of a COVID-19 response, the bank: increased mobile deposit limits, refunded fees incurred due to financial hardship on consumer deposit accounts, forgave or established repayment plans for consumer credit card late fees, and provided payment relief for consumer credit and mortgage relief options.

The bank originated 123 CD loans totaling \$338.8 million without a purpose/mandate/function (PMF) to benefit its AAs. These loans had a neutral impact on the bank's rating. The bank made 231 investments totaling \$178.7 million without a PMF to benefit its AA. These investments had a neutral impact on the bank's rating.

### Lending in Assessment Area

A high percentage of the bank's loans are in its AAs.

The bank originated and purchased 80.5 percent of its total loans, by number of loans, and 72.6 percent of loans by dollar amount, inside the AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

<b>Lending Inside and Outside of the Assessment Areas</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	5,597	82.2	1,212	17.8	6,809	2,162,851	69.1	966,691	30.9	3,129,542
Small Business	10,083	81.2	2,334	18.8	12,417	1,646,644	79.5	425,039	20.5	2,071,683
Small Farm	251	44.5	313	55.5	564	40,676	39.2	63,111	60.8	103,787
<b>Total</b>	<b>15,931</b>	<b>80.5</b>	<b>3,859</b>	<b>19.5</b>	<b>19,790</b>	<b>3,850,171</b>	<b>72.6</b>	<b>1,454,841</b>	<b>27.4</b>	<b>5,305,012</b>

## Description of Bank

UMB is a multistate financial institution headquartered in Kansas City, Missouri. UMB is a wholly-owned subsidiary of UMB Financial Corporation, founded in 1913 and headquartered in Kansas City, Missouri.

UMB is a full-service bank with 94 branches and 100 deposit-taking automated teller machines (ATMs). For this performance evaluation the bank has nine rating areas: Kansas City Combined Statistical Area (Kansas City CSA), St. Louis Multistate Metropolitan Statistical Area (St. Louis MMSA), and the states of Arizona, Colorado, Kansas, Missouri, Nebraska, Oklahoma, and Texas. Refer to the MMSA or State rating sections of this evaluation for details on the bank's performance by area.

UMB offers commercial banking, which includes comprehensive deposit, lending (Commercial & Industrial, Commercial Real Estate, small business, etc.), treasury management and investment services; personal banking, which includes deposit services, mortgage and other lending, wealth management, and financial planning services, and institutional banking, which includes asset servicing, corporate trust solutions, investment banking, and healthcare services.

According to the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report dated June 30, 2022, the bank had total deposits of \$30.3 billion. As of December 31, 2022, the bank had total assets of \$38.3 billion, total loans of \$21 billion, and tier 1 capital of \$3.2 billion.

The bank did not undertake any bank acquisitions or mergers during the evaluation period.

UMB Capital Corporation, a wholly owned subsidiary of UMB, is a Small Business Investment Company (SBIC) as recognized by the Small Business Administration. This program is intended to bridge the gap between entrepreneurs' need for capital and traditional sources of financing.

There are no legal, financial, or other factors that may impede the bank's ability to meet the credit needs in its AAs. The bank was rated "Satisfactory" at the last published CRA Performance Evaluation dated May 25, 2020.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The OCC evaluated Home Mortgage Disclosure Act (HMDA); and small loans to businesses and farms (CRA reported loans) originated and purchased by the bank between January 1, 2020 and December 31, 2021 (evaluation period). The OCC evaluated CD loans; qualified investments; CD and retail services between January 1, 2020 and December 31, 2022 (evaluation period). The evaluation period for HMDA and small loans to businesses and farms is only two years because 2022 aggregate peer lending data used for analyzing the bank's Lending Test performance was not available. Aggregate peer lending data is used to compare the bank's lending performance to the performance of other lenders within the AAs. Examiners did not consider consumer loans in this evaluation, as consumer lending was not a substantial majority of the bank's business and management did not request consideration. Examiners considered qualifying activities performed in response to the significant impact of the COVID-19 pandemic across the United States that occurred during the evaluation period. This included consideration of loans made under the Small Business Administration's (SBA) PPP as either small loans to businesses or farms under the borrower and geographic distribution of lending analysis, or as CD loans, depending on their size.

### Lending Test

Examiners did not perform statistical analysis or draw conclusions on lending performance for a loan product if the bank originated and purchased fewer than 20 loans within an AA during the evaluation period. The evaluation of home mortgage lending considered and concluded upon home purchase, home refinance, and home improvement loans in aggregate. Multifamily loans meeting the definition of CD were included in the evaluation of CD lending.

### Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AA(s) within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same MSA, MMSA, or CSA are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating section for details regarding how full-scope AAs were selected. Refer to Appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

### Ratings

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings.

The Kansas City CSA received the greatest weight in concluding on the bank's CRA performance. The rating area accounts for 71.1 percent of the bank's deposits, 35.6 percent of HMDA and CRA reportable loans combined, and 33.3 percent of the bank's branch network. The St. Louis MMSA received the next greatest weight in concluding on the bank's performance. The St. Louis MMSA accounts for 7.1 percent of the bank's deposits, 14.2 percent of combined HMDA and CRA reportable loans, and 14.4 percent of the bank's branches. The states where overall performance received the next greatest weight are, in order of their weight, Colorado, Arizona, Kansas, Missouri, Texas, Oklahoma, and Nebraska.

The MMSA and state ratings are based on performance in all bank AAs. Refer to the “Scope” section under each State and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

## Description of Factors Considered Under Each Performance Test

### Lending Test

#### Lending Activity –

Examiners assessed lending activity responsiveness in each AA by comparing the bank’s market share percentage and rank for deposits to each lending product market share percentage and rank. We also took into consideration the bank’s performance relative to the level of competition in the respective AA. In this approach, the bank’s market share rank is divided by the total number of depository institutions or lenders, respectively. This approach takes into consideration the differences between the number of insured depository institutions and the number of home mortgage, small business, and small farm lenders within the AA.

#### SBA PPP Loans –

Due to the exigent circumstances related to the COVID-19 pandemic, the bank responded to the needs of small businesses within its AAs by originating a significant volume of loans under the PPP. UMB received and decisioned approximately 8,500 PPP loan applications for a total dollar amount exceeding \$2 billion. Banks were not required to collect revenue information as part of the underwriting process for PPP loans. In many cases, the bank was unable to collect borrower income information due to the exigent nature of the PPP lending program. The significant volume of PPP loans in the bank’s AAs resulted in a very low percentage of small loans to small businesses compared to the percentage of small businesses and aggregate lending in the AAs. During 2020 and 2021, 68 percent of the bank’s loans reported as small loans to businesses were PPP loans. The bank originated a total of 6,825 PPP loans during that period. Of those loans, 27 percent were underwritten without revenue information from the borrowers.

Consistent with Interagency guidance<sup>1</sup>, we considered the unique circumstances affecting borrowers and banks resulting from the COVID-19 pandemic and did not penalize the bank for originating a large volume of loans without obtaining gross annual revenue information. When concluding on borrower income distribution of small loans to small businesses, we considered the bank’s responsiveness to the needs created by the COVID-19 pandemic resulting in the significant volume of small business loans without revenue information. Given the extraordinary circumstances and needs brought on by the COVID-19 pandemic and the bank’s responsiveness to those needs by originating a significant volume of PPP loans, we gave positive consideration to the bank’s lending to small businesses in its rating areas and AAs.

#### Community Development (CD) Loans Quantitative Analysis –

When conducting quantitative analysis of CD loans, we compared the proportion of the bank’s CD loans to tier 1 capital allocated to a respective bank AA. The higher the proportion of bank CD loans as compared to allocated tier 1 capital, the better the performance is relative to the quantitative aspects of CD loan performance. To determine the amount of tier 1 capital to allocate to a respective AA, we used the tier 1 capital number at the end of the evaluation period. In addition to the quantitative analysis,

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<sup>1</sup> Community Reinvestment Act (CRA) Frequently Asked Questions Related to COVID-19: [Community Reinvestment Act \(CRA\) Frequently Asked Questions Related to COVID-19 \(occ.gov\)](#)

examiners also considered performance context information, including the responsiveness of the bank's CD lending and the opportunities to make CD loans in the AA.

## **Investment Test**

### **CD Investments Quantitative Analysis –**

When conducting quantitative analysis of CD investments, we compared the proportion of the bank's CD investments to tier 1 capital as allocated to the bank's respective AA. The higher the proportion of the bank's CD investments compared to the allocated tier 1 capital, the better the performance is relative to the quantitative aspects of CD investment performance. To determine the amount of tier 1 capital to allocate to a respective AA, we typically use the total tier 1 capital number at the end of the evaluation period. In addition to the quantitative analysis, examiners consider performance context information, including the responsiveness of the bank's investments, whether the bank took a leadership role in developing and making an investment, and whether the investments are innovative and/or complex.

## **Service Test**

### **Retail Branches –**

Primary consideration in evaluating the bank's performance under the Service Test in both full- and limited-scope AAs was given to UMB's performance in delivering retail products and services to geographies and individuals of different income levels through the bank's distribution of branches. Analysis of retail branches focused on the current distribution of the bank's branches in low-to-moderate income (LMI) geographies. The analysis of the distribution of the bank's retail branches was based on locations as of December 31, 2022, and the income category classifications for the locations were based on the 2020 Census data.

In the full-scope AAs, examiners considered branches located in middle- or upper-income (MUI) geographies that improved accessibility to bank products and services for customers in LMI geographies. UMB management provided data on the percentage of consumer demand deposit accounts (DDA) opened in MUI branches in 2022 by customers residing in LMI geographies. Positive consideration was given to the MUI branches located in close proximity to LMI geographies and increasing the access to retail banking services for customers in LMI geographies.

### **Alternate Delivery Systems –**

UMB complements its traditional service delivery systems with alternative delivery systems, including online banking, mobile banking, text banking, deposit-taking ATMs, and digital account opening. These services are available to retail and business customers throughout the bank's AAs. No significant weight was placed on these services, as no analysis and data were available to determine the impact of the alternative delivery systems on bank customers.

### **Branch Openings and Closings –**

Over the evaluation period, UMB closed two branches within its AAs. Management performed an analysis focused on transaction volume and customer impact prior to closing any branches. This performance criteria was not assessed for the Service Test evaluation in AAs where the bank had no branch openings or closings during the evaluation period.

### **Branch Hours and Retail Products and Services –**



The range of products and services offered in the bank's branches were evaluated. The evaluation specifically focused on any differences in branch hours, products, and services provided in LMI geographies compared to those provided in MUI geographies. Branch hours and retail products and services offered at branches are consistent throughout the bank's AAs regardless of the income level of the area. The bank's services in each of the AAs, including business hours, where appropriate, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals.

Community Development Services –

The bank's record of providing CD services was evaluated in the AAs that received full-scope reviews. CD services were evaluated based upon the number of activities, the time spent by bank employees performing CD services, the number of people benefiting from the services, and the responsiveness of the services to identified community needs.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 C.F.R. §25.28(c) 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.

## Multistate Metropolitan Statistical Area Rating

### Kansas City CSA

<b>CRA rating for the Kansas City CSA<sup>2</sup>:</b>	Outstanding
<b>The Lending Test is rated:</b>	High Satisfactory
<b>The Investment Test is rated:</b>	Outstanding
<b>The Service Test is rated:</b>	Outstanding

The major factors that support this rating include:

- Lending levels reflect good responsiveness to credit needs in its AA;
- The bank exhibits a good geographic distribution of loans in its AAs;
- The bank exhibits a poor distribution of loans among individuals of different income levels and businesses of different sizes;
- The bank is a leader in originating CD loans and was responsive to community needs which had a positive impact on the Lending Test conclusion;
- The bank has an excellent level of CD investments and grants;
- Service delivery systems are readily accessible to geographies and individuals of different income levels in the AAs; and
- The bank provides a significant level of CD services.

### Description of Bank's Operations in Kansas City CSA

The Kansas City CSA represents the largest rating area for the entire bank with 71.1 percent of deposits, 34.4 percent of branches, and 36.2 percent of all bank loans. The bank chose full counties in all AAs. The bank offers a full range of loan and deposit products and services in its AA through its branches within the rating area.

Refer to Appendix A: Scope of the Examination – List of Assessment Areas and Type of Examination for the counties used to form the AAs.

Based on FDIC deposit market share data as of June 30, 2022 the bank had \$31.7 billion in deposits representing a 26.7 percent deposit market share and is ranked first out of 102 financial banks doing business in the AA. The deposits account for 71.1 percent of the total bank deposits. The largest depository institutions include Commerce Bank, Bank of America, and U.S. Bank.

The bank originated and purchased 36.4 percent of total bank loans in the rating area. Home mortgages represented 37.4 percent, loans to small businesses represented 61.7 percent, and small

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<sup>2</sup>This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

loans to farms represented 0.9 percent of lending in the rating area.

To aid in identifying needs and opportunities within the AA, the OCC considered feedback from two community contacts during the evaluation period, as well as an OCC listening session involving 15 community organizations. Community contacts included a local community agency specializing in affordable housing, economic development, and community services. Community contacts and organizations identified the following credit and CD needs for the AA:

- Affordable housing (single and multifamily) and housing support services
- Financial support for operations of nonprofit organizations
- Small business loans, including microloans
- Very small dollar loans for entrepreneurs to test new business ideas and products
- Financial education
- Job training
- Affordable banking products

In addition to the contacts conducted and reviewed by examiners, the bank performed its own assessment of community needs and opportunities within the Kansas City CSA. UMB management identified affordable housing, economic development, and healthcare services as needs within the CSA.

The following table provides information on the demographic composition of the bank’s full-scope AA(s).

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Kansas City CSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	521	15.2	21.9	32.8	26.5	3.6
Population by Geography	1,993,410	9.1	20.9	37.6	32.2	0.3
Housing Units by Geography	854,143	10.8	22.1	37.8	28.8	0.5
Owner-Occupied Units by Geography	501,855	5.7	17.2	39.2	37.7	0.2
Occupied Rental Units by Geography	273,592	15.9	29.2	37.3	16.9	0.7
Vacant Units by Geography	78,696	25.2	28.8	30.7	13.5	1.7
Businesses by Geography	175,834	7.2	18.1	34.4	38.4	1.8
Farms by Geography	4,973	4.8	14.6	42.5	37.7	0.3
Family Distribution by Income Level	499,411	21.1	17.2	20.4	41.3	0.0
Household Distribution by Income Level	775,447	23.5	16.5	17.6	42.5	0.0
Median Family Income MSA – 28140 Kansas City, MO-KS MSA		\$72,623	Median Housing Value			\$160,319
Median Family Income MSA – 41140 St. Joseph, MO-KS MSA		\$59,820	Median Gross Rent			\$847
Median Family Income Non-MSAs – KS		\$57,229	Families Below Poverty Level			9.4%
Median Family Income Non-MSAs – MO		\$48,341				

*Source: 2015 ACS and 2021 D&B Data  
Due to rounding, totals may not equal 100.0%  
(\* The NA category consists of geographies that have not been assigned an income classification.*

One method used to assess housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income or a maximum monthly mortgage payment of \$908 for low-income borrowers and \$1,452 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$616. Based on the information in the above table and the analysis of that data, a mortgage loan for purchasing a home in the AA would generally be affordable for LMI borrowers.

According to the September 2022 Moody's Analytics report, strengths for the AA include a well-developed transportation and distribution network, an educated workforce, above-average per capita income, and below-average cost of doing business. Though lagging the regional and national average, the AA will continue to experience steady growth. The 2022 unemployment rate for the AA was 2.6 percent compared to 6.1 percent in 2020. The leading industries by wage tier include the federal government, computer systems design services, management of companies and enterprises, and architectural, engineering services. Major employers include Children's Mercy Hospital, Cerner Corp., Honeywell, Saint Luke's Health System, and Truman Medical Centers.

### **Scope of Evaluation in Kansas City CSA**

A full-scope review of the Kansas City CSA was performed as it is both the rating area and the only AA. Bank delineated AAs located in the same MSA are combined, analyzed, and presented as one AA for purposes of this evaluation. Refer to Appendix A – Scope of Examination, for a list of all AAs under review. More weight was given to the small loans to businesses conclusion than to the home mortgage conclusions in the AA.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS CITY CSA**

### **LENDING TEST**

The bank's performance under the Lending Test in the Kansas City CSA is rated High Satisfactory when taking into consideration the impact of CD lending.

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

### **Lending Activity**

Lending levels reflect good responsiveness to AA credit needs considering the number and dollar amount of home mortgage and small business loans relative to the bank's lending capacity based on deposits, competition, and market presence.

<b>Number of Loans</b>					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Kansas City CSA	2,171	3,584	51	119	5,925

<b>Dollar Volume of Loans (000's)</b>					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Kansas City CSA	554,676	518,245	8,852	470,394	1,552,167

The following factors support the bank's good responsiveness to community credit needs:

- The bank has the highest deposit market share among the 105 depository institutions in the AA. The bank's deposit market share is 26.3 percent.
- Competition for loans is significant in the AA. There are a total of 745 residential mortgage lenders and 204 small business lenders in the AA. The number of small farm lenders in the AA is significantly lower than mortgage and business lenders with 39 lenders in the market.
- The bank's market share (0.9 percent) and rank (34) for mortgage lending are significantly below those for deposits in the AA. The ranking for mortgage lending is near to the rank for deposits when considered in relation to the number of competitors. The deposit rank is in the 1<sup>st</sup> percentile, but the bank's mortgage lending rank is in the 5<sup>th</sup> percentile.
- The bank's market share (2.9 percent) and rank (9) are also significantly below those for deposits. When considered in relation to the number of competitors, the bank's rank (4<sup>th</sup> percentile) is near to the deposit rank.
- Small farm lending is not a strategic focus for the bank and the market share (1.4 percent), and rank (12) are significantly below those for deposits and reflect the bank's primary focus on small business and residential mortgage lending. The rank for small farm lending (30<sup>th</sup> percentile) remains significantly below the rank for deposits when considered in relation to the number of competitors.

### **Distribution of Loans by Income Level of the Geography**

The bank exhibits a good geographic distribution of loans in its AA.

#### ***Home Mortgage Loans***

Refer to table O of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of the bank's home mortgage lending was poor. The proportion of loans was significantly below the percentage of owner-occupied housing units in low-income geographies and was somewhat near to the aggregate. The proportion of loans was well below the percentage of owner-occupied housing units in moderate-income geographies and the aggregate.

#### ***Small Loans to Businesses***

Refer to table Q of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of the bank's small loans to businesses was excellent. The proportion of loans exceeded both the percentage of businesses in LMI geographies and the aggregate.

### ***Small Loans to Farms***

Refer to table S of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

The geographic distribution of the bank's small loans to farms was adequate. The proportion of loans was below the percentage of farms in low-income geographies and the aggregate. The proportion of loans was below the percentage of farms in moderate-income geographies and the aggregate. The conclusion on the bank's small farm lending takes into consideration that it is not a strategic focus for the bank. The low volume of small loans to farms and the performance conclusion of adequate are consistent with bank's strategic focus of small farm lending on an accommodation basis only.

### ***Lending Gap Analysis***

Maps of the bank's lending, supervisory data, and other summary reports were reviewed. No unexplained conspicuous gaps in the bank's lending within the rating area were identified.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibits an adequate distribution of loans among individuals of different income levels and business and farms of different sizes.

### ***Home Mortgage Loans***

Refer to table P 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 the bank's home mortgage lending was adequate. The proportion of loans was well below the percentage of low-income families and below the aggregate. The proportion of loans was somewhat near to the percentage of moderate-income families and below the aggregate.

### ***Small Loans to Businesses***

Refer to table R of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The borrower distribution of small loans to business was adequate, based upon consideration of performance context information discussed in the front section of the PE. During the evaluation period, the bank originated 34.8 percent of its small loans to businesses without revenue information. The percentage of bank loans in 2020 and 2021 to businesses with revenues less than \$1 million was significantly below the percentage of businesses and the aggregate industry distribution of loans to those businesses. However, we gave positive consideration for the bank's responsiveness to the needs created by the COVID-19 pandemic by making a significant volume of PPP lending without revenue information.

### ***Small Loans to Farms***

Refer to table T of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

The borrower distribution of the bank's loans to small loans to farms by revenue was adequate. The proportion of loans was well below the percentage of small farms and exceeds the aggregate.

### **Community Development Lending**

The bank is a leader in making CD loans which had a positive impact in the overall Lending Test rating in the rating area.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank originated 119 loans totaling \$470 million representing 24.8 percent of allocated tier one capital. The bank utilized CD lending opportunities to meet identified credit needs. The bank supported identified CD needs of affordable housing (18 loans totaling \$152 million) and community support services (25 loans totaling \$113 million).

### **Product Innovation and Flexibility**

The bank makes adequate use of innovative and/or flexible lending practices to serve AA credit needs. Refer to Overall CRA Rating – Product Innovation and Flexibility for more detail.

### **INVESTMENT TEST**

The bank's performance under the Investment Test in the Kansas City CSA is rated Outstanding.

### **Conclusions for Areas Receiving Full-Scope Reviews**

Based on full-scope reviews, the bank's performance in the Kansas City CSA is excellent.

The bank has an excellent level of qualified CD investments, grants, and donations, often in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits excellent responsiveness to credit and community economic development needs. The bank makes extensive use of innovative and/or complex investments to support CD initiatives. The majority of investments support affordable housing.



**Number and Amount of Qualified Investments**

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Kansas City CSA	85	50,032	261	113,696	346	100.0	163,728	100.0	-	-

\* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.  
 \*\* Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

Considering the number of competitors in the market the bank's level of qualified CD investment relative to investment opportunities and capacity in the AA is excellent. The bank made 346 investments, donations, and grants totaling approximately \$163.7 million. This includes 85 prior period investments totaling \$50 million and 37 current period investments totaling \$109.5 million. Additionally, the bank made 224 grants and donations totaling \$4.3 million. The bank's total investments represented 7.2 percent of allocated tier 1 capital. The bank's CD investments were responsive to affordable housing needs, including demonstrating leadership and complexity through debt and equity financing of low-income housing tax credits (LIHTCs).

Examples of investments made during the valuation period include:

- A \$20 million tax credit investment for the acquisition and rehabilitation of a 130-unit senior affordable housing center.
- A \$6.2 million LIHTC equity investment for the acquisition and rehabilitation of a 69-unit affordable housing property.
- A \$200,000 investment into an equity fund, utilized to administer a small business relief fund.

**SERVICE TEST**

The bank's performance under the Service Test in the Kansas City CSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Kansas City CSA is excellent.

**Retail Banking Services**

Service delivery systems are accessible to geographies and individuals of different income levels in the bank's AA(s).

Distribution of Branch Delivery System														
Assessment Area	Deposits		Branches					Population						
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography					
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA	

Kansas City CSA	100.0	32	100.0	6.3	18.8	46.9	25.0	3.1	9.1	20.9	37.6	32.2	0.3
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The percentage of branches located in low-income areas is below the percentage of the population residing in these geographies. The percentage of branches located in moderate- income areas is near to the percentage of the population residing in these geographies. Seven branches in the middle- or upper-income geographies were within proximity to serve low- or moderate-income areas. One bank branch is in proximity to a low-income geography and six bank branches are in proximity to serve moderate-income geographies. Bank management provided analysis and data showing bank deposit customers documenting the MUI branches enhanced accessibility to bank products and services for the residents of the LMI CTs. The enhanced accessibility provided by the MUI branches merited positive consideration and had a positive impact on the conclusion on the accessibility of the bank’s service delivery systems to geographies and individuals of different income levels in the bank’s AA. The branch distribution in the AA is good.

UMB complements its traditional service delivery systems with alternative delivery systems, including online banking, mobile banking, text banking, deposit-taking ATMs, and digital account opening. These services are available to retail and business customers throughout the bank’s AAs. No significant weight was placed on these services, as no analysis and data were available to determine the impact of the alternative delivery systems on bank customers.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Branch Openings/Closings			
			Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Kansas City CSA		1		-1		

To the extent changes have been made, the bank’s record of opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. UMB closed one branch in a moderate-income geography for economic reasons due to decreased transaction volume.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. Services offered and branch hours are comparable amongst locations regard of the income level of the area.

**Community Development Services**

The bank provides a significant level of CD services, consistent with its capacity and expertise to conduct specific activities. Organizations benefiting from the bank’s CD services were involved in a variety of CD activities. CD services in the AA consisted of 327 individuals who participated in 1,396 activities, performing 4,375 hours of CD activities at 130 different organizations. Employees participated in 1,348 community service volunteer activities, 24 economic development activities, 21 of

affordable housing activities, and three revitalization and stabilization activities. Thirty-four bank staff members served either as directors, committee members or officers to various CD organizations.

The following are examples of qualified CD services in the AA:

- An employee served 309 hours as a board and committee member for an organization that provides care to assist LMI individuals. This organization aids with crisis intervention, shelter, counseling, advocacy, and education.
- Seventy-four employees volunteered 497 hours with a program that provided financial education to LMI students. Employees conducted financial concept workshops with students.
- Twelve employees volunteered with an organization that connects disabled LMI individuals to the resources they need. Two additional employees served as board members. Employees served a total of 199 hours with this organization.

## Multistate Metropolitan Statistical Area Rating

### St. Louis MMSA

<b>CRA rating for the St. Louis MMSA<sup>3</sup>:</b>	Satisfactory
<b>The Lending Test is rated:</b>	High Satisfactory
<b>The Investment Test is rated:</b>	Outstanding
<b>The Service Test is rated:</b>	High Satisfactory

The major factors that support this rating include:

- Lending levels reflect good responsiveness to credit needs in its AA;
- The bank exhibits an adequate geographic distribution of loans in its AA;
- The bank exhibits an adequate distribution of loans among individuals of different income levels and businesses of different sizes;
- The bank is a leader in originating CD loans and was responsive to community needs which had a positive impact on the lending test conclusion;
- The bank has an excellent level of CD investments and grants;
- Service delivery systems are accessible to geographies and individuals of different income levels in the AAs; and
- The bank provides a significant level of CD services.

### Description of Bank's Operations in St. Louis MMSA

The St. Louis MMSA represents the second largest rating area for the bank with 6.4 percent of deposits, 15.1 percent of branches, and 14.2 percent of all bank loans. The bank chose full counties in all AAs. The bank offers a full range of loan and deposit products and services in its AA through its branches within the rating area.

Refer to Appendix A: Scope of the Examination – List of Assessment Areas and Type of Examination for the counties used to form the AAs.

Based on FDIC deposit market share data as of June 30, 2022 the bank had \$2.0 billion in deposits representing a 1.7 percent deposit market share in the AA and is ranked 12th out of 86 financial banks doing business in the AA. The deposits account for 6.4 percent of the total bank deposits. The largest depository institutions include Bank of America, U.S. Bank, Stifel Bank and Trust, and Commerce Bank.

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<sup>3</sup> This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

The bank originated and purchased 14.2 percent of total bank loans in the rating area. Home mortgages represented 31 percent and loans to small businesses represented 69 percent of lending in the AA.

To help identify needs and opportunities within the St. Louis MMSA, three community contacts were performed during the evaluation period as part of the performance evaluation. The community contacts were economic development organizations focusing on economic development, financial education, small business development, and neighborhood organization. Community contacts identified the following credit and CD needs in the AA:

- Products for first time home buyers
- Affordable housing
- Financial education
- Specialized loan products for LMI and small businesses
- Ongoing support for bank products
- Creation of more job opportunities for the unemployed and underemployed

In addition to the contacts conducted and reviewed by examiners, the bank performed its own assessment of community needs and opportunities within the St. Louis MMSA. UMB management identified healthcare services, youth services, childcare services, and after-school programs as needs within the MMSA.

The following table provides information on the demographic composition of the bank’s full-scope AA(s).

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: STL MMSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	547	14.4	21.4	32.9	30.5	0.7
Population by Geography	2,449,944	9.9	19.7	35.7	34.4	0.3
Housing Units by Geography	1,083,823	11.4	21.0	35.6	31.7	0.3
Owner-Occupied Units by Geography	663,559	5.7	17.6	38.0	38.7	0.1
Occupied Rental Units by Geography	308,161	18.1	26.3	33.6	21.3	0.6
Vacant Units by Geography	112,103	27.1	26.6	27.1	18.8	0.3
Businesses by Geography	203,656	7.3	18.7	32.4	40.8	0.9
Farms by Geography	5,131	3.6	14.8	41.3	39.8	0.4
Family Distribution by Income Level	624,598	21.7	16.9	19.6	41.8	0.0
Household Distribution by Income Level	971,720	24.2	15.9	17.3	42.6	0.0
Median Family Income MSA – 41180 St. Louis, MO-IL MSA		\$70,718	Median Housing Value			\$166,734
			Median Gross Rent			\$840
			Families Below Poverty Level			9.8%

*Source: 2015 ACS and 2021 D&B Data  
Due to rounding, totals may not equal 100.0%  
(\* The NA category consists of geographies that have not been assigned an income classification.*

One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income or a maximum monthly mortgage payment of \$884 for low-income borrowers and \$1,414 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$1,151. Based on the information in the above table and the analysis of that data, it would be challenging for low-income borrowers to afford a mortgage loan for purchasing a home in the AA.

According to the September 2022 Moody's Analytics report, the AA strengths are below-average living and business costs, location in central U.S. near major highways and the Mississippi River, below-average employment volatility, workforce is over-educated relative to industry mix. The AA's growth is lagging the regional and national average in the near term and will continue to lag. The 2022 unemployment rate for the AA was 3.2 percent compared to 6.8 percent in 2020. The leading industries by wage tier include food and kindred products, chemicals, primary metal, manufacturing, fabricated metal products, and machinery, except electrical. Major employers include BJC Healthcare, Walmart, Mercy Health Care, Washington University in St. Louis, and Boeing Defense, Space and Security.

### **Scope of Evaluation in St. Louis MMSA**

A full-scope review of the St. Louis MSA was performed as it was the only AA in the rating area. Bank delineated AAs located in the same MSA are combined, analyzed, and presented as one AA for purposes of this evaluation. Refer to Appendix A – Scope of Examination, for a list of all AAs under review. More weight was given to the small loans to businesses conclusion than to the home mortgage conclusions in both AAs.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ST. LOUIS MMSA**

### **LENDING TEST**

The bank's performance under the Lending Test in the St. Louis MMSA is rated High Satisfactory when taking into consideration the impact of CD lending.

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

### **Lending Activity**

Lending levels reflect good responsiveness to AA credit needs considering the number and dollar amount of home mortgage and small business loans relative to the bank's lending capacity based on deposits, competition, and market presence.

<b>Number of Loans</b>					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
St. Louis MMSA	700	1,555	0	46	3,726

<b>Dollar Volume of Loans (000's)</b>					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
St. Louis MMSA	261,366	280,895	0	114,042	835,571

The following factors support the bank's good responsiveness to community credit needs:

- The bank, with a deposit market share of 1.9 percent, is ranked 11 of 87 depository institutions in the AA.
- Competition for loans is significant in the AA. There are 728 residential mortgage lenders and 201 small business lenders in the AA.
- The bank's market share (0.2 percent) and rank (79) for mortgage lending are significantly below those for deposits in the AA. The ranking for mortgage lending is above the rank for deposits when considered in relation to the number of competitors. The deposit rank is in the 13<sup>th</sup> percentile and the bank's mortgage lending rank is in the 11<sup>th</sup> percentile.
- The bank's market share (1.1 percent) and rank (22) for small business lending are well below those for deposits. When considered in relation to the number of competitors, the bank's small business lending rank (11<sup>th</sup> percentile) is above the deposit rank.

### **Distribution of Loans by Income Level of the Geography**

The bank exhibits an adequate geographic distribution of loans in its AA.

#### ***Home Mortgage Loans***

Refer to table O of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of the bank's home mortgage lending was very poor. The proportion of loans was significantly below the percentage of owner-occupied housing units in low-income geographies and the aggregate. The proportion of loans was significantly below the percentage of owner-occupied housing units in moderate-income geographies and well below the aggregate.

#### ***Small Loans to Businesses***

Refer to table Q of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of the bank's small loans to businesses was excellent. The proportion of loans exceeds the percentage of businesses in low-income geographies and exceeds the aggregate. The proportion of loans was somewhat near to the percentage of businesses in moderate-income geographies and somewhat near to the aggregate.

***Lending Gap Analysis***

Maps of the bank's lending, supervisory data, and other summary reports were reviewed. No unexplained conspicuous gaps in the bank's lending within the rating area were identified.

**Distribution of Loans by Income Level of the Borrower**

The bank exhibits an adequate distribution of loans among individuals of different income levels and business and farms of different sizes.

***Home Mortgage Loans***

Refer to table P 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 the bank's home mortgage lending was adequate. The proportion of loans was well below the percentage of low-income families and below the aggregate. The proportion of loans was somewhat near to the percentage of moderate-income families and well below the aggregate.

***Small Loans to Businesses***

Refer to table R of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The borrower distribution of small loans to business was adequate, based upon consideration of performance context information discussed in the front section of the PE. During the evaluation period, UMB originated 27.3 percent of its small loans to businesses in the AA without revenue information. The percentage of bank loans in 2020 and 2021 to businesses with revenues less than \$1 million was significantly below the percentage of businesses and the aggregate industry distribution of loans to those businesses. However, we gave positive consideration for the bank's responsiveness to the needs created by the COVID-19 pandemic by making a significant volume of PPP lending without revenue information.

**Community Development Lending**

The bank is a leader in making CD loans which had a positive impact in the overall Lending Test rating in the rating area.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

**St. Louis MMSA**

The bank originated 46 loans totaling \$114 million representing 59.1 percent of allocated tier one capital. The bank utilized CD lending opportunities to meet identified credit needs. The bank supported



CD needs of affordable housing (two loans totaling \$16.7 million) and community support services (four loans totaling \$3.2 million).

### Product Innovation and Flexibility

The bank makes adequate use of innovative and/or flexible lending practices to serve AA credit needs. Refer to Overall CRA Rating – Product Innovation and Flexibility for more detail.

### INVESTMENT TEST

The bank’s performance under the Investment Test in the St. Louis MMSA is rated Outstanding.

### Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the St. Louis MMSA is excellent.

The bank has an excellent level of qualified CD investments, grants, and donations, often in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits excellent responsiveness to credit and community economic development needs. The bank makes extensive use of innovative and/or complex investments to support CD initiatives. Majority of investments support affordable housing.

### Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
St. Louis MMSA	19	6,772	133	43,329	152	100.0	50,101	100.0	0	0

\* Prior Period Investments’ means investments made in a previous evaluation period that are outstanding as of the examination date.

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

#### St. Louis MMSA

Considering the number of competitors in the market the bank’s level of qualified CD investments relative to investment opportunities and capacity in the AA is excellent. The bank made 152 investments, grants, and donations totaling \$50.1 million. This includes 19 prior period investments totaling \$6.8 million and 30 current period investments totaling \$42.4 million. Additionally, the bank made 103 grants and donations totaling \$935,000. The bank’s total investments represented 24.5 percent of allocated tier 1 capital. The bank’s CD investments were responsive to affordable housing needs through both debt and equity financing of LIHTCs.

Examples of investments made during the valuation period include:

- A \$10.4 million tax credit investment for the construction of an a 54-unit affordable housing property.

- A \$5.1 million LIHTC to assist in financing renovation and construction of an 88-unit affordable multifamily property.
- A \$1.8 million investment made through an SBA loan fund that is a Community Development Financial Institution (CDFI) with the primary purpose of promoting job creation and retention for LMI individuals.

**SERVICE TEST**

The bank’s performance under the Service Test in the St. Louis MMSA is rated High Satisfactory.

Based on a full-scope review, the bank’s performance in the St. Louis MMSA is good.

**Retail Banking Services**

Service delivery systems are accessible to geographies and individuals of different income levels in the bank’s AA(s).

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
St. Louis MMSA	100.0	14	100.0	0.0	35.7	21.4	42.9	9.9	19.7	35.7	34.4

The bank does not have branches in low-income areas. The percentage of branches located in moderate-income areas exceed the percentage of the population residing in these geographies. The bank has one branch in a middle-income geography in proximity to serve a low-income geography. Bank management provided analysis and data showing bank deposit customers being served in the LMI CTs. This contributed positively to conclusions. The branch distribution in the AA is good.

UMB complements its traditional service delivery systems with alternative delivery systems, including online banking, mobile banking, text banking, deposit-taking ATMs, and digital account opening. These services are available to retail and business customers throughout the bank’s AAs. Significant weight was not placed on these services as no analysis and data were available to determine the impact of the alternative delivery systems on bank customers.

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. Services offered and branch hours are comparable among locations regardless of the income level of the area.

## **Community Development Services**

The bank provides a significant level of CD services. This is consistent with its capacity and expertise to conduct specific activities. Organizations benefiting from the bank's CD services were involved in a variety of CD activities. CD services in the AA included 25 individuals who participated in 135 activities, performing 317 hours of community service activities at 25 different organizations. Employees participated in 119 community service volunteer activities and 16 affordable housing activities. Nine staff members served either as directors, committee members, or officers to various CD organizations.

The following are examples of qualified CD services in the AA:

- An employee served 70 hours as a board and committee member for an organization supporting LMI students. The organization runs a free educational supply store in Missouri and equips LMI students in over 160 St. Louis area schools where over 70 percent of students receive free or reduced lunch.
- An employee served 24 hours as a board and finance committee member for an organization that provides affordable housing. This organization develops properties into affordable communities for LMI families.

## State Rating

### State of Arizona

<b>CRA rating for the State of Arizona:</b>	Satisfactory
<b>The Lending Test is rated:</b>	High Satisfactory
<b>The Investment Test is rated:</b>	Outstanding
<b>The Service Test is rated:</b>	Needs to Improve

The major factors that support this rating include:

- Lending levels reflect good responsiveness to credit needs in its AA;
- The bank exhibits a good geographic distribution of loans in its AA;
- The bank exhibits a poor distribution of loans among individuals of different income levels and businesses of different sizes;
- The bank is a leader in originating CD loans and was responsive to community needs which had a positive impact on the Lending Test conclusion;
- The bank has an excellent level of CD investments and grants;
- Service delivery systems are unreasonably inaccessible to geographies and individuals of different income levels in the AAs; and
- The bank provides a significant level of CD services.

### Description of Bank's Operations in Arizona

The bank has one AA within the state, the Phoenix MSA. The bank offers a full range of loan and deposit products and services in its AA through its branches within the rating area.

Refer to Appendix A: Scope of the Examination – List of Assessment Areas and Type of Examination for the counties used to form the AAs.

Based on FDIC deposit market share data as of June 30, 2022, the bank had \$1.7 billion in deposits representing a 0.9 percent deposit market share in the AA and is ranked 13th out of 61 financial banks doing business in the AA. The deposits account for 5.2 percent of the total bank deposits. The largest depository institutions include JP Morgan Chase, Wells Fargo, Bank of America, and Western Alliance.

The bank originated and purchased 11.3 percent of total bank loans in the rating area. Home mortgages represented 29.8 percent and loans to small businesses represented 70.0 percent of lending in the AA.

To help identify needs and opportunities within the Phoenix MSA AA, examiners performed three community contacts during the evaluation period. The community contacts were performed with one local government agency focused on economic development and two contacts were organizations focused on financial counseling, affordable housing, behavioral health, and community development services. Community contacts identified the following credit and CD needs in the AA:

- Affordable housing
- Financial education
- Micro small business loans
- Small consumer loans
- Acquisition and rehabilitation of homes

Each contact identified affordable housing as the primary need within the AA.

In addition to the contacts conducted and reviewed by examiners, the bank performed its own assessment of community needs and opportunities within the Phoenix MSA AA. UMB management identified workforce development and healthcare services as additional primary needs within the AA.

The following table provides information on the demographic composition of the bank’s full-scope AA(s).

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Phoenix MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	916	11.5	22.5	31.2	33.4	1.4
Population by Geography	4,018,143	11.1	22.9	31.3	34.4	0.3
Housing Units by Geography	1,668,555	9.8	23.4	33.3	33.4	0.1
Owner-Occupied Units by Geography	875,327	4.6	18.8	34.7	41.9	0.0
Occupied Rental Units by Geography	567,191	17.1	29.4	31.2	21.9	0.3
Vacant Units by Geography	226,037	11.8	25.6	33.2	29.3	0.2
Businesses by Geography	792,533	7.0	15.2	29.5	47.8	0.5
Farms by Geography	12,656	7.2	18.5	28.9	45.1	0.3
Family Distribution by Income Level	945,115	21.8	16.9	19.2	42.2	0.0
Household Distribution by Income Level	1,442,518	23.3	16.3	17.7	42.7	0.0
Median Family Income MSA – 38060 Phoenix-Mesa-Chandler, AZ MSA		\$63,686	Median Housing Value			\$203,811
			Median Gross Rent			\$993
			Families Below Poverty Level			12.6%
<i>Source: 2015 ACS and 2021 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant’s income or a maximum monthly mortgage payment of \$796 for low-income borrowers and \$1,274 for moderate-income borrowers. Assuming a

30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner’s insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$2,146. Based on the information in the above table and the analysis of that data, a mortgage loan for purchasing a home in the AA would generally be affordable for LMI borrowers.

According to the September 2022 Moody’s Analytics report, the AA strengths are robust population growth and in-migration, it is a hub for expansion and relocation of banks, insurance companies, and business services firms, and lower business costs than in California. The AA’s growth is outperforming the regional and national average in the near term and will continue to outperform in the long-term. The 2022 unemployment rate for the AA was 3.5 percent compared to 4.7 percent in 2020. The leading industries by wage tier include offices of physicians, agencies, brokerages, and other insurance, management of companies and enterprises, computer systems design and services. Major employers include Banner Health System, Walmart, Fry’s Food Stores, Wells Fargo, and Arizona State University.

### Scope of Evaluation in Arizona

A full-scope review of the Phoenix MSA was performed as it was the only AA in the state. Bank delineated AAs located in the same MSA are combined, analyzed, and presented as one AA for purposes of this evaluation. More weight was given to the small loans to businesses conclusion than to the home mortgage conclusions in the AA.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ARIZONA

### LENDING TEST

The bank’s performance under the Lending Test in Arizona is rated High Satisfactory.

### Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the Phoenix MSA is good

### Lending Activity

Lending levels reflect good responsiveness to AA credit needs considering the number and dollar amount of home mortgage and small business loans relative to the bank’s lending capacity based on deposits, competition, and market presence.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Phoenix MSA	534	1,255	5	44	1,838	100	100

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans (000's)*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Phoenix MSA	397,790	214,214	1,235	223,244	836,483	100	100

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

The following factors support the bank's good responsiveness to community credit needs:

- The bank, with a deposit market share of 0.9 percent, is ranked 13 of 61 depository institutions in the AA.
- Competition for loans is significant in the AA. There are 1,072 residential mortgage lenders and 303 small business lenders in the AA.
- The bank's market share (0.1 percent) and rank (175) for mortgage lending are significantly below those for deposits in the AA. The ranking for mortgage lending is above the rank for deposits when considered in relation to the number of competitors. The deposit rank is in the 21<sup>st</sup> percentile and the bank's mortgage lending rank is in the 16<sup>th</sup> percentile.
- The bank's market share (0.4 percent) and rank (23) for small business lending are well below those for deposits. When considered in relation to the number of competitors, the bank's small business lending rank (8<sup>th</sup> percentile) is well above the deposit rank.

### **Distribution of Loans by Income Level of the Geography**

The bank exhibits a good geographic distribution of loans in its AA.

#### ***Home Mortgage Loans***

Refer to table O of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of the bank's home mortgage lending was very poor. The proportion of loans was significantly below the percentage of owner-occupied housing units in low-income geographies and the aggregate. The proportion of loans was significantly below the percentage of owner-occupied housing units in moderate-income geographies and well below the aggregate.

#### ***Small Loans to Businesses***

Refer to table Q of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of the bank's small loans to businesses was excellent. The proportion of loans exceeded both the percentage of businesses in LMI geographies and the aggregate.

#### ***Lending Gap Analysis***

Maps of the bank's lending, supervisory data, and other summary reports were reviewed. No unexplained conspicuous gaps in the bank's lending within the rating area were identified.

## **Distribution of Loans by Income Level of the Borrower**

The bank exhibits a poor distribution of loans among individuals of different income levels and businesses of different sizes.

### ***Home Mortgage Loans***

Refer to table P 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 the bank's home mortgage lending was very poor. The proportion of loans was significantly below the percentage of low-income families and significantly below the aggregate. The proportion of loans was well below the percentage of moderate-income families and significantly below the aggregate.

### ***Small Loans to Businesses***

Refer to table R 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 business was adequate, based upon consideration of performance context information discussed in the front section of the PE. During the evaluation period, UMB made 34.4 percent of its small loans to businesses in the AA without revenue information. The percentage of bank loans in 2020 and 2021 to businesses with revenues less than \$1 million was significantly below the percentage of businesses and the aggregate industry distribution of loans to those businesses. However, we gave positive consideration for the bank's responsiveness to the needs created by the COVID-19 pandemic by making a significant volume of PPP lending without revenue information.

## **Community Development Lending**

The bank is a leader in making CD loans which had a positive impact in the overall Lending Test rating in the rating area.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

### **Phoenix MSA**

The bank originated 44 loans totaling \$223 million representing 154.1 percent of allocated tier one capital. The bank utilized CD lending opportunities to meet identified credit needs. The bank supported identified CD needs of community support services (one loan totaling \$240,000), economic development (23 loans totaling \$37 million), and revitalization and stabilization (one loan totaling \$60 million). Additionally, the bank made two loans benefiting the broader statewide area totaling \$10 million without a P/M/F to benefit the bank's AA.



## Product Innovation and Flexibility

The bank makes adequate use of innovative and/or flexible lending practices to serve AA credit needs. Refer to Overall CRA Rating – Product Innovation and Flexibility for more detail.

## INVESTMENT TEST

The bank’s performance under the Investment Test in Arizona is rated Outstanding.

## Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank’s performance in the Phoenix MSA is excellent.

The bank has an excellent level of qualified CD investments, grants, and donations, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits excellent responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives. The majority of investments support affordable housing.

## Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Phoenix MSA	3	268	100	36,703	103	100.0	36,971	100.0	0	0

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

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

### Phoenix MSA

The bank’s level of qualified CD investment relative to investment opportunities and capacity in the AA is excellent. The bank made 103 investments, grants, and donations totaling approximately \$37 million. This includes three prior period investments totaling \$268,000 and 30 current period investments totaling \$35.9 million. Additionally, the bank made 70 grants and donations totaling \$775,000. The bank’s total investments represented 22.1 percent of allocated tier 1 capital. The bank’s CD investments were responsive to affordable housing needs, primarily through mortgage-backed securities (MBS).

Examples of investments made during the valuation period include:

- A \$4.6 million MBS for affordable housing consisting of 21 loans all to LMI borrowers.
- A total of \$4.5 million in school bonds for an elementary school district where the majority of students are LMI for the purpose of repairing school buildings, security improvements, and new school construction.
- A \$4.2 million investment into an SBA Loan Fund that is a CDFI with the purpose of promoting job creation and retention for LMI individuals.

## SERVICE TEST

The bank’s performance under the Service Test in Arizona is rated Needs to Improve.

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Phoenix MSA AA is poor.

### Retail Banking Services

Delivery systems are unreasonably inaccessible to significant portions of the AA, particularly LMI geographies and/or LMI individuals.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Phoenix	100.0	7	100.0	0.0	0.0	42.9	57.1	11.1	22.9	31.3	34.4

#### Phoenix MSA

The bank has no branches located in a low- or moderate-income areas. The branch distribution in the AA is very poor.

UMB complements its traditional service delivery systems with alternative delivery systems, including online banking, mobile banking, text banking, deposit-taking ATMs, and digital account opening. These services are available to retail and business customers throughout the bank’s AAs. No significant weight was placed on these services, as no analysis and data were available to determine the impact of the alternative delivery systems on bank customers.

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. Services offered and branch hours are comparable among locations regardless of the income level of the area.

### Community Development Services

The bank provides a significant level of CD services, consistent with its capacity and expertise to conduct specific activities. CD services in the AA included 22 individuals who participated in 175 activities, performing 613 hours of community service activities at 20 different organizations. All CD services completed by employees were community service volunteer activities. Nine employees served either as directors, committee members, or officers to various CD organizations.

The following are examples of qualified CD services in the AA:

- An employee served 183 hours as a board member for an organization that raises funds for charities that serve LMI individuals.
- An employee served 53 hours as a board member for an organization that provides financial assistance to LMI programs.
- An employee served 43 hours as a board member for an organization that provides support to LMI individuals through emergency shelter, education, and foster care.

## State Rating

### State of Colorado

**CRA rating for the State of Colorado:** Satisfactory

**The Lending Test is rated:** High Satisfactory

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect good responsiveness to credit needs in its AAs;
- The bank exhibits a good geographic distribution of loans in its AAs;
- The bank exhibits a poor distribution of loans among individuals of different income levels and businesses of different sizes;
- The bank is a leader in originating CD loans and was responsive to community needs which had a positive impact on the Lending Test conclusion;
- The bank has an excellent level of CD investments and grants;
- Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the AAs; and
- The bank provides a significant level of CD services.

### Description of Bank's Operations in Colorado

The bank has two AAs within the state, which are the Colorado Springs MSA and Denver MSA. The bank chose full counties in all AAs. The bank offers a full range of loan and deposit products and services in its AA through its branches within the rating area.

Refer to Appendix A: Scope of the Examination – List of Assessment Areas and Type of Examination for the counties used to form the AAs.

#### Colorado Springs MSA

Based on FDIC deposit market share data as of June 30, 2022, the bank had \$467.9 million in deposits representing a 4.0 percent deposit market share in the AA and is ranked fifth out of 39 financial banks doing business in the AA. The deposits account for 1.5 percent of the total bank deposits. The largest depository institutions include Wells Fargo, JP Morgan Chase, U.S. Bank, and Firstbank.

The bank originated and purchased 3.3 percent of total bank loans in the AA. Home mortgages represented 34.4 percent and loans to small businesses represented 65.6 percent of lending in the AA.

Denver MSA

Based on FDIC deposit market share data as of June 30, 2022, the bank had \$2.4 billion in deposits representing a 1.9 percent deposit market share in the AA and is ranked ninth out of 66 financial banks doing business in the AA. The deposits account for 7.7 percent of the total bank deposits. The largest depository institutions include Wells Fargo, U.S. Bank, JP Morgan Chase, and Firstbank.

The bank originated and purchased 17.3 percent of total bank loans in the AA. Home mortgages represented 40.3 percent and loans to small businesses represented 59.5 percent of lending in the AA.

Colorado Springs MSA

To help identify needs and opportunities within the Colorado Springs MSA AA, examiners conducted two community contacts and attended an FDIC-sponsored listening session during the evaluation period. The OCC-conducted contacts were with representatives of organizations focused on economic development. The FDIC listening session was conducted with 31 representatives from community-based organizations and local government. Community contacts identified the following needs within the Colorado Springs MSA AA:

- Affordable housing
- Donations to school-based savings program
- Investments within county private activity bonds
- Worker development through upskilling
- Addressing food insecurities in LMI communities
- Improved transportation
- Healthcare services

UMB bankers performed their own needs assessment for the AA and identified healthcare services, youth services, childcare services, and after-school programs as needs within the AA.

Denver MSA

Examiners performed three community contacts during the evaluation period to identify needs and opportunities within the Denver MSA AA. Community contacts specialized in affordable housing, community development, small- and medium-size business development, and economic development. Community contacts identified the following credit and CD needs in the AA:

- Transportation for transit residents
- Affordable housing
- Financial education

Additionally, bank management performed an assessment of needs within the Denver MSA AA. They identified youth services, childcare services, after-school programs, and affordable housing as needs within the Denver MSA AA.

The following tables provides information on the demographic composition of the bank's full-scope AA.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Colorado Springs MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	130	5.4	30.8	38.5	23.8	1.5
Population by Geography	655,024	4.7	26.8	39.7	27.4	1.4
Housing Units by Geography	261,745	5.3	28.8	39.2	26.7	0.0
Owner-Occupied Units by Geography	153,354	3.3	20.7	42.2	33.8	0.0
Occupied Rental Units by Geography	91,933	8.1	41.5	35.1	15.3	0.1
Vacant Units by Geography	16,458	7.6	34.5	33.5	24.4	0.0
Businesses by Geography	96,961	6.9	23.2	34.1	35.7	0.1
Farms by Geography	2,284	6.9	20.9	42.2	30.0	0.0
Family Distribution by Income Level	168,103	20.4	18.5	20.3	40.8	0.0
Household Distribution by Income Level	245,287	22.7	16.7	19.0	41.6	0.0
Median Family Income MSA – 17820 Colorado Springs, CO MSA		\$71,351	Median Housing Value			\$224,065
			Median Gross Rent			\$987
			Families Below Poverty Level			8.4%
<i>Source: 2015 ACS and 2021 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

A method used to evaluate the affordability of housing in an area assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income or a maximum monthly mortgage payment of \$892 for low-income borrowers and \$1,427 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the Colorado Springs MSA median housing value would be \$2,545. Based on the information in the table above and analysis of that information, LMI families would be challenged to afford a mortgage to purchase a home in the AA.

According to the September 2022 Moody's Analytics report, AA strengths include a highly skilled workforce and many working-age residents, lower living and business costs than in neighboring Denver, the University of Colorado, and a concentration of technology-intensive industries. The AA's growth is outperforming the regional and national average in the near term and will continue to outperform in the long-term. The 2022 unemployment rate for the AA was 3.1 percent compared to 5.7 percent in 2020. The leading industries by wage tier include federal government, computer systems design and related services, architectural, engineering and related services, and offices of physicians. Major employers include Walmart Inc., Air Force Academy, Schriever Air Force Base, UCHHealth Memorial Hospital, and Penrose-St. Francis Health Services.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Denver MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>D NA* % of #</b>
Geographies (Census Tracts)	587	8.7	25.0	32.0	33.4	0.9
Population by Geography	2,588,488	9.1	25.0	32.2	33.6	0.1
Housing Units by Geography	1,048,213	8.7	24.4	33.7	33.2	0.0
Owner-Occupied Units by Geography	623,986	4.8	19.4	33.7	42.1	0.0
Occupied Rental Units by Geography	372,043	14.6	32.4	33.8	19.1	0.0
Vacant Units by Geography	52,184	12.2	26.4	33.0	28.4	0.0
Businesses by Geography	490,039	7.0	19.5	31.3	41.9	0.3
Farms by Geography	8,575	8.1	20.1	30.5	41.0	0.3
Family Distribution by Income Level	627,437	21.6	17.5	20.4	40.5	0.0
Household Distribution by Income Level	996,029	23.7	16.6	18.2	41.5	0.0
Median Family Income MSA – 19740 Denver-Aurora-Lakewood, CO MSA		\$80,820	Median Housing Value			\$280,595
			Median Gross Rent			\$1,067
			Families Below Poverty Level			8.2%
<i>Source: 2015 ACS and 2021 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

One method used to assess the affordability of housing is to assume a maximum monthly principal and interest payment of no more than 30 percent of the applicant’s income or a maximum monthly mortgage payment of \$1,010 for low-income borrowers and \$1,616 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner’s insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$2,859. Based on the information in the table above and analysis of that information, LMI families would be challenged to afford a mortgage in the AA.

According to the September 2022 Moody’s Analytics report, strengths for the Denver MSA are a high concentration of dynamic, knowledge-based industries, strong in-migration and population growth, a skilled workforce, and high employment diversity. The AA’s growth is slowing but continuing to outperform the regional and national average in the near term and the Denver economy will continue to strengthen in the long-term. The 2022 unemployment rate for the AA was 3.6 percent compared to 7.1 percent in 2020. The leading industries by wage tier include computer systems design and related services, management of companies and enterprises, architectural, engineering and related services, and the federal government. Major employers include HealthONE, UCHealth: University of Colorado Hospital, Lockheed Martin Corporation, United Airlines, and Children’s Hospital Colorado.

## Scope of Evaluation in Colorado

The Colorado Springs MSA AA and the Denver MSA AA received full-scope reviews. The AAs account for all loans, branches, and deposits in the state throughout the evaluation period. Bank

delineated AAs located in the same MSA are combined, analyzed, and presented as one AA for purposes of this evaluation. Refer to Appendix A – Scope of Examination, for a list of all AAs under review. More weight was given to the small loans to businesses conclusion than to the home mortgage conclusions in the Colorado Springs MSA. The same weight was given to the small loans to business and home mortgage conclusions in the Denver MSA. The Denver MSA rating carries more weight due to the AA representing more than 63 percent of loans, branches, and deposits in the rating area.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN COLORADO

### LENDING TEST

The bank’s performance under the Lending Test in Colorado is rated High Satisfactory when taking into consideration the impact of CD lending.

### Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the Colorado Springs MSA is good. Based on full-scope reviews, the bank’s performance in the Denver MSA is adequate.

### Lending Activity

Lending levels reflect good responsiveness to AA credit needs considering the number and dollar amount of home mortgage and small business loans relative to the bank’s lending capacity based on deposits, competition, and market presence.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Colorado Springs MSA	178	340	-	12	530	15.8	16.5
Denver MSA	1,110	1,638	4	72	2,824	84.2	83.5

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans (000's)*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Colorado Springs MSA	51,715	55,015	-	33,530	140,260	9.5	
Denver MSA	659,818	283,510	343	386,160	1,329,831	90.5	

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

### Colorado Springs MSA

The following factors support the bank’s good responsiveness to community credit needs:



- The bank, with a deposit market share of 3.8 percent, is ranked six of 38 depository institutions in the Colorado Springs MSA AA.
- Competition for loans is significant in the AA. There are 684 residential mortgage lenders and 148 small business lenders in the AA.
- The bank's market share (0.1 percent) and rank (104) for mortgage lending are significantly below those for deposits in the AA. The ranking for mortgage lending is equal to the rank for deposits when considered in relation to the number of competitors. The deposit rank is in the 16<sup>th</sup> percentile and the bank's mortgage lending rank is in the 16<sup>th</sup> percentile.
- The bank's market share (0.6 percent) and rank (20) for small business lending are well below those for deposits. When considered in relation to the number of competitors, the bank's small business lending rank (14<sup>th</sup> percentile) is above the deposit rank.

#### Denver MSA

The following factors support the bank's good responsiveness to community credit needs:

- The bank, with a deposit market share of 1.8 percent, is ranked 10 of 68 depository institutions in the AA.
- Competition for loans is significant in the AA. There are 977 residential mortgage lenders and 280 small business lenders in the AA.
- The bank's market share (0.2 percent) and rank (105) for mortgage lending are significantly below those for deposits in the AA. The ranking for mortgage lending is near to the rank for deposits when considered in relation to the number of competitors. The deposit rank is in the 15<sup>th</sup> percentile and the bank's mortgage lending rank is in the 11<sup>th</sup> percentile.
- The bank's market share (0.7 percent) and rank (22) for small business lending are well below those for deposits. When considered in relation to the number of competitors, the bank's small business lending rank (8<sup>th</sup> percentile) is significantly above the deposit rank.

### **Distribution of Loans by Income Level of the Geography**

The bank exhibits a good geographic distribution of loans in its AA.

#### ***Home Mortgage Loans***

Refer to table O of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

#### Colorado Springs MSA

The geographic distribution of the bank's home mortgage lending was adequate. The proportion of loans was below the percentage of owner-occupied housing units in low-income geographies and was somewhat near to the aggregate. The proportion of loans was well below the percentage of owner-occupied housing units in moderate-income geographies and below the aggregate.

#### Denver MSA

The geographic distribution of the bank's home mortgage lending was poor. The proportion of loans was well below the percentage of owner-occupied housing units in low-income geographies and the aggregate. The proportion of loans was significantly below the percentage of owner-occupied housing units in moderate-income geographies and the aggregate.

***Small Loans to Businesses***

Refer to table Q of Colorado section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

**Colorado Springs MSA**

The geographic distribution of the bank's small loans to businesses was excellent. The proportion of loans exceeded both the percentage of businesses in LMI geographies and the aggregate.

**Denver MSA**

The geographic distribution of the bank's small loans to businesses was excellent. The proportion of loans exceeded both the percentage of businesses in LMI geographies and the aggregate.

***Lending Gap Analysis***

Maps of the bank's lending, supervisory data, and other summary reports were reviewed. No unexplained conspicuous gaps in the bank's lending within the rating area were noted.

**Distribution of Loans by Income Level of the Borrower**

The bank exhibits a poor distribution of loans among individuals of different income levels and business of different sizes.

***Home Mortgage Loans***

Refer to table P of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

**Colorado Springs MSA**

The borrower distribution of the bank's home mortgage lending was adequate. The proportion of loans was significantly below the percentage of low-income families and exceeds the aggregate. The proportion of loans was well below the percentage of moderate-income families and below the aggregate.

**Denver MSA**

The borrower distribution of the bank's home mortgage lending was very poor. The proportion of loans was significantly below the percentage of low-income families and significantly below the aggregate. The proportion of loans was well below the percentage of moderate-income families and significantly below the aggregate.

***Small Loans to Businesses***

Refer to table R 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.

**Colorado Springs MSA**

The distribution of small loans to businesses of different sizes was adequate, based upon consideration of performance context information discussed in the front section of the PE. During the evaluation

period, the bank made 31.2 percent of its small loans to businesses in the AA without review information. The percentage of bank loans in 2020 and 2021 to businesses with revenues less than \$1 million was significantly below the percentage of businesses and the aggregate industry distribution of loans to those businesses. However, we gave positive consideration for the bank's responsiveness to the needs created by the COVID-19 pandemic by making a significant volume of PPP lending without revenue information.

#### Denver MSA

The borrower distribution of small loans to businesses in the Denver MSA AA was adequate, based upon consideration of the performance context information discussed in the front section of the PE. UMB made 27.5 percent of its small loans to businesses in the Denver MSA AA during the evaluation period without revenue information. The percentage of bank loans made in 2020 and 2021 to businesses with revenues of less than \$1 million was significantly below the percentage of businesses and the aggregate industry distribution of loans to those businesses. However, we gave positive consideration for the bank's responsiveness to the needs created by the COVID-19 pandemic by making a significant volume of PPP lending without revenue information.

### **Community Development Lending**

The bank is a leader in making CD loans which had a positive impact in the overall Lending Test rating in the rating area.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

#### Colorado Springs MSA

The bank originated 12 loans totaling \$33.5 million representing 86.9 percent of allocated tier one capital. The bank utilized CD lending opportunities to meet identified credit needs. The bank supported identified CD needs, including revitalization and stabilization (one loan totaling \$10.3 million), economic development (six loans totaling \$9.2 million), and two loans totaling \$259,000 to support essential infrastructure.

#### Denver MSA

The bank originated 72 loans totaling \$386 million representing 198.4 percent of allocated tier one capital. The bank utilized CD lending opportunities to meet identified credit needs. The bank supported identified CD needs of revitalization and stabilization (one loan totaling \$40 million), and support of essential infrastructure (two loans totaling \$1.8 million).

Additionally, the bank made 10 loans benefiting the broader statewide area totaling \$13.7 million without a P/M/F to benefit the bank's AAs.

### **Product Innovation and Flexibility**

The bank makes adequate use of innovative and/or flexible lending practices to serve AA credit needs. Refer to Overall CRA Rating – Product Innovation and Flexibility for more detail.

## INVESTMENT TEST

The bank's performance under the Investment Test in Colorado is rated Outstanding.

### Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Denver MSA is excellent and performance in the Colorado Springs MSA is good.

The bank has an excellent level of qualified CD investments, grants, and donations, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits good responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives. Majority of investments support affordable housing.

### Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Colorado Springs MSA	3	527	56	8,403	59	31.9	8,930	13.4	0	0
Denver MSA	5	1,453	121	56,247	126	68.1	57,700	86.6	0	0

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

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

#### Colorado Springs MSA

Considering the number of competitors in the market, the bank's level of qualified CD investment relative to investment opportunities and capacity in the AA is good. The bank made 59 investments, grants, and donations totaling approximately \$9 million. This includes three prior period investments totaling \$527,000 and 16 current period investments totaling \$8.3 million. Additionally, the bank made 40 grants and donations totaling \$90,000. The bank's total investments represented 19.1 percent of allocated tier 1 capital. The bank's CD investments were responsive to affordable housing needs, primarily through MBSs.

Investments made during the valuation period include:

- Nineteen MBSs totaling \$8.8 million supporting affordable housing to LMI individuals in El Paso County.
- A \$10,000 sponsorship aiming to improve the health and well-being for LMI people with life-threatening illness.
- A \$4,000 donation to an online platform that offers financial education to LMI individuals.

Denver MSA

Considering the number of competitors in the market, the bank's level of qualified CD investment relative to investment opportunities and capacity in the AA is excellent. The bank made 126 investments, grants, and donations totaling approximately \$57.7 million. This includes five prior period investments totaling \$1.5 million and 28 current period investments totaling \$54.5 million. Additionally, the bank made 93 grants and donations totaling \$1.7 million. The bank's total investments represented 23.6 percent of allocated tier 1 capital. The bank's CD investments were responsive to affordable housing needs, primarily through MBSs.

Examples of investments made during the valuation period include:

- A \$15.6 million LIHTC investment to provide construction financing for a 151-unit affordable multifamily property within Denver.
- A total of \$12.2 million investments into an SBA loan fund that is a CDFI with the primary purpose of promoting job creation and retention for LMI individuals.

**SERVICE TEST**

The bank's performance under the Service Test in Colorado is rated Low Satisfactory.

**Conclusions for Areas Receiving Full-Scope Reviews**

Based on full-scope reviews, the bank's performance in Colorado Springs MSA is excellent and Denver MSA is adequate.

**Retail Banking Services**

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits % of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Branches				Population			
				Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Colorado Springs MSA	16.5	4	36.4	25.0	25.0	25.0	25.0	4.7	26.8	39.7	27.4
Denver MSA	83.5	7	63.6	14.3	0.0	28.6	57.1	9.1	25.0	32.2	33.6

Colorado Springs MSA

The percentage of branches located in low-income areas exceeds the percentage of the population residing in these geographies. The percentage of branches located in moderate-income areas is near to the percentage of the population residing in these geographies. There are four branches in middle- and upper-income geographies serving residents in low- or moderate-income areas. The bank had one branch in proximity to serve a low-income geography and three branches in

proximity to serve a moderate-income geography. Bank management provided analysis and data showing bank deposit customers being served in the LMI CTs. This contributed positively to conclusions. The branch distribution in the AA is excellent.

UMB complements its traditional service delivery systems with alternative delivery systems, including online banking, mobile banking, text banking, deposit-taking ATMs, and digital account opening. These services are available to retail and business customers throughout the bank's AAs. No significant weight was placed on these services, as no analysis and data were available to determine the impact of the alternative delivery systems on bank customers.

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. Services offered and branch hours are comparable among locations regardless of the income level of the area.

### Denver MSA

The percentage of branches located in low-income areas exceeds the percentage of the population residing in these geographies. There are no branches located in moderate-income areas. One branch in an upper-income geography improves accessibility to bank products and services to residents in a low-income area. Bank management provided analysis and data showing bank deposit customers being served in the low-income area. The enhanced accessibility contributed minimally to conclusions because it enhanced accessibility in an area with the percentage of branches already exceeding the performance of population in the low-income geography. The branch distribution in the AA is poor.

The bank complements its traditional service delivery systems with alternative delivery systems, including online banking, mobile banking, text banking, deposit-taking ATMs, and digital account opening. These services are available to retail and business customers throughout the bank's AAs. No significant weight was placed on these services, as no analysis and data were available to determine the impact of the alternative delivery systems on bank customers.

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. Services offered and branch hours are comparable among locations regardless of the income level of the area.

## **Community Development Services**

The bank provides a significant level of CD services.

### Colorado Springs MSA

The bank is a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities. CD services in the AA included 12 individuals who participated in 138 activities, performing 1,004 hours of CD activities at 11 different organizations. Employees participated in 137 community service volunteer activities and one affordable housing activity. Three employees served either as directors, committee members, or officers to various CD organizations.

The following are examples of qualified CD services in the AA:

- An employee served 582 hours as a board member for an organization that supports financial literacy and assistance programs for LMI individuals.
- An employee served 155 hours as a board member for an organization that assists low-income individuals impacted by medical complications.
- An employee served 61 hours as a volunteer and board member for an organization that aids LMI individuals in the Pikes Peak region.

#### Denver MSA

The bank provides a significant level of CD services, consistent with its capacity and expertise to conduct specific activities. CD services in the AA included 31 individuals who participated in 123 activities, performing 490 hours of community service activities at 20 different organizations. Employees participated in 122 community service volunteer activities and one affordable housing activity. Eight employees served either as directors, committee members, or officers to various CD organizations.

The following are examples of qualified CD services in the AA:

- An employee served 144 hours as a board member for an organization that provides emotional support to LMI individuals. This employee led board meetings and was a member of the finance committee.
- An employee served 50 hours as a board and committee member for an organization that provides food to LMI individuals.

## State Rating

### State of Kansas

<b>CRA rating for the State of Kansas:</b>	Satisfactory
<b>The Lending Test is rated:</b>	High Satisfactory
<b>The Investment Test is rated:</b>	Outstanding
<b>The Service Test is rated:</b>	Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect adequate responsiveness to credit needs in its AAs;
- The bank exhibits a good geographic distribution of loans in its AAs;
- The bank exhibits an adequate distribution of loans among individuals of different income levels and businesses of different sizes;
- The bank is a leader in originating CD loans and was responsive to community needs which had a positive impact on the Lending Test conclusion;
- The bank has an excellent level of CD investments and grants;
- Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the AAs; and
- The bank provides an adequate level of CD services.

### Description of Bank's Operations in Kansas

The bank has six AAs within the state. These include the Kansas Non-MSA (KS Non-MSA), Lawrence MSA, Manhattan MSA, Salina MSA, Topeka MSA, and Wichita MSA. The bank chose full counties in all AAs. The bank offers a full range of loan and deposit products and services in its AA through its branches within the rating area.

Refer to Appendix A: Scope of the Examination – List of Assessment Areas and Type of Examination for the counties used to form the AAs.

#### KS Non-MSA

Based on FDIC deposit market share data as of June 30, 2022, the bank had \$150.7 million in deposits representing a 12.7 percent deposit market share in the AA and is ranked first out of 20 financial banks doing business in the AA. The deposits account for 0.5 percent of the total bank deposits. In addition to UMB, the largest depository institutions include Exchange Bank and Trust, Pinnacle Bank, and Landmark National Bank.

The bank originated and purchased 2.2 percent of total bank loans in the AA. Home mortgages



represented 19.5 percent, loans to small businesses represented 47.7 percent, and loans to small farms represented 22.7 percent of lending in the AA.

#### Lawrence MSA

Based on FDIC deposit market share data as of June 30, 2021, the bank had \$33.6 million in deposits representing a 0.9 percent deposit market share in the AA and is ranked 17<sup>th</sup> out of 22 financial banks doing business in the AA. The deposits account for 0.1 percent of the total bank deposits. The largest depository institutions include Capital Federal Savings, U.S. Bank, Bank of America, and Intrust.

The bank originated and purchased 0.5 percent of total bank loans in the AA. Home mortgages represented 30.5 percent and loans to small businesses represented 69.5 percent of lending in the AA.

#### Topeka MSA

Based on FDIC deposit market share data as of June 30, 2022, the bank had \$357.4 million in deposits representing a 6.9 percent deposit market share in the AA and is ranked fourth out of 19 financial banks doing business in the AA. The deposits account for 1.1 percent of the total bank deposits. The largest depository institutions include Capital Federal Savings, Corefirst, U.S. Bank, and Silver Lake.

The bank originated and purchased 0.6 percent of total bank loans in the AA. Home mortgages represented 21.6 percent and small business loans represented 78.4 percent of lending in the AA.

#### KS Non MSA

Examiners performed four community contacts during the evaluation period to identify needs within the Kansas Non-MSA AA. The community contacts focus on agricultural education and funding.

Community contacts identified the following needs in AA:

- Financial education
- Lending for agricultural operating expenses
- Small business lending

#### Lawrence MSA

To identify community needs, examiners reviewed three community contacts conducted for CRA examinations at other banks with concurrent evaluation periods. The community contacts focus on financial counseling, homebuyer education, community development, and public housing. The following community needs in the Lawrence MSA AA were identified by the contacts:

- LMI educational investment grants
- Loan programs offering low down payments and flexible underwriting
- Financial literacy
- Affordable housing
- Small or micro loans for LMI individuals
- Flexible checking and savings accounts for LMI individuals
- Small business loans

#### Topeka MSA

Examiners reviewed two community contacts performed for CRA examinations at other banks with concurrent evaluation periods. Community contacts specialize in economic development, business

recruitment, workforce development, and financial education. Community contacts identified the following credit and CD needs in the AA:

- Housing programs through the Federal Home Loan Bank (FHLB) for LMI individuals.
- Homebuyer education
- Affordable housing

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: KS Non-MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	13	0.0	15.4	76.9	7.7	0.0
Population by Geography	41,316	0.0	12.2	75.7	12.1	0.0
Housing Units by Geography	20,072	0.0	14.2	74.1	11.7	0.0
Owner-Occupied Units by Geography	12,041	0.0	11.7	76.7	11.6	0.0
Occupied Rental Units by Geography	4,680	0.0	15.7	69.7	14.6	0.0
Vacant Units by Geography	3,351	0.0	21.2	70.9	8.0	0.0
Businesses by Geography	2,821	0.0	14.3	70.6	15.1	0.0
Farms by Geography	377	0.0	2.4	92.6	5.0	0.0
Family Distribution by Income Level	11,256	20.2	19.1	21.6	39.1	0.0
Household Distribution by Income Level	16,721	25.7	16.7	17.3	40.2	0.0
Median Family Income Non-MSAs – KS		\$57,229	Median Housing Value			\$94,138
			Median Gross Rent			\$590
			Families Below Poverty Level			9.5%
<i>Source: 2015 ACS and 2021 D&amp;B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income or a maximum monthly mortgage payment of \$715 for low-income borrowers and \$1,145 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$450. Based on the information in the table above and the analysis of that information, a mortgage would be affordable for LMI families in the AA.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Lawrence MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	22	9.1	31.8	36.4	22.7	0.0
Population by Geography	114,967	10.2	29.2	31.9	28.6	0.0
Housing Units by Geography	47,812	6.3	33.6	31.6	28.5	0.0
Owner-Occupied Units by Geography	22,806	1.3	25.4	36.9	36.3	0.0
Occupied Rental Units by Geography	20,923	11.2	41.0	25.8	22.0	0.0

Vacant Units by Geography	4,083	9.0	40.9	31.9	18.2	0.0
Businesses by Geography	8,510	6.0	30.2	31.9	31.9	0.0
Farms by Geography	355	0.6	20.3	53.2	25.9	0.0
Family Distribution by Income Level	23,794	19.1	19.6	20.6	40.7	0.0
Household Distribution by Income Level	43,729	26.4	15.1	17.5	41.0	0.0
Median Family Income MSA – 29940 Lawrence, KS MSA		\$72,755	Median Housing Value			\$188,808
			Median Gross Rent			\$854
			Families Below Poverty Level			8.1%

Source: 2015 ACS and 2021 D&B Data

Due to rounding, totals may not equal 100.0%

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

A method available to assess housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant’s income or a maximum monthly mortgage payment of \$909 for low-income borrowers and \$1,455 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner’s insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$1,704. Based on the information in Table A above and analysis of the information, LMI families would be challenged to afford a mortgage in the AA.

According to the September 2022 Moody’s Analytics report, the economic strengths of the Lawrence MSA AA include an abundance of skilled labor provided by the University of Kansas, low living and business costs, a young population, and improving net migration. The AA’s growth is lagging the regional and national average in the near term and will track in the long-term. The 2022 unemployment rate for the AA was 2.5 percent compared to 5.8 percent in 2020. The leading industries by wage tier include computer systems design and related services, business, professional, labor, political and similar, the federal government, and offices of physicians. Major employers include The University of Kansas, Maximus Inc., Lawrence Memorial Hospital, Hallmark Cards, and Amarr Entrematic.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Topeka MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	43	11.6	23.3	39.5	25.6	0.0
Population by Geography	178,792	8.2	18.8	39.7	33.3	0.0
Housing Units by Geography	79,425	9.0	20.6	41.1	29.3	0.0
Owner-Occupied Units by Geography	45,873	4.6	15.3	39.1	41.0	0.0
Occupied Rental Units by Geography	25,495	14.2	26.6	45.9	13.3	0.0
Vacant Units by Geography	8,057	18.0	31.1	37.2	13.7	0.0
Businesses by Geography	11,747	15.4	17.8	40.1	26.6	0.0
Farms by Geography	416	4.8	8.9	27.6	58.7	0.0
Family Distribution by Income Level	44,654	20.8	17.2	21.8	40.3	0.0
Household Distribution by Income Level	71,368	24.0	17.2	18.1	40.7	0.0

Median Family Income MSA – 45820 Topeka, KS MSA	\$64,984	Median Housing Value	\$116,437
		Median Gross Rent	\$752
		Families Below Poverty Level	10.5%
<i>Source: 2015 ACS and 2021 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>			

One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant’s income or a maximum monthly mortgage payment of \$812 for low-income borrowers and \$1,300 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner’s insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$703. Based on the information in the table above and analysis of that information, a mortgage would be affordable for LMI families in the AA.

According to the September 2022 Moody’s Analytics report, the AA strengths are low costs of living and doing business, low employment volatility relative to the U.S., and increased venture capital and worker retention investments. The AA’s growth is lagging in the near term and will continue to lag in the long-term. The 2022 unemployment rate for the AA was 2.6 percent compared to 5.5 percent in 2020. The leading industries by wage tier include the federal government, agencies, brokerages and insurance carriers, and management of companies and enterprises. Major employers include Stormont-Vail Regional Medical Center, Hill’s Pet Nutrition Inc., Goodyear Tire and Rubber Co., BNSF Railway, Blue Cross Blue Shield, and University of Kansas Health System – St. Francis Campus.

## Scope of Evaluation in Kansas

The Kansas Non-MSA, Lawrence MSA, and Topeka MSA received full-scope review. The three AAs account for 55.8 percent of loans, 44.4 percent of branches, and 61.8 percent of deposits in the state throughout the evaluation period. All remaining AAs received limited-scope reviews. Bank delineated AAs located in the same MSA are combined, analyzed, and presented as one AA for purposes of this evaluation. Refer to Appendix A – Scope of Examination, for a list of all AAs under review. More weight was given to the small loans to businesses conclusion than to the home mortgage conclusions in the Lawrence MSA, Topeka MSA, and Wichita MSA. More weight was given to the small loans to businesses conclusion than to the home mortgage and loans to small farms conclusions in the Kansas Non-MSA, Manhattan MSA, and Salina MSA.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS

### LENDING TEST

The bank’s performance under the Lending Test in Kansas is rated High Satisfactory when taking into consideration the impact of CD lending.

### Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the KS Non-MSA, Lawrence MSA, and Topeka MSA is adequate.

## Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs considering the number and dollar amount of home mortgage, small business, and small farm loans relative to the bank's lending capacity based on deposits, competition, and market presence.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
KS Non-MSA	57	166	79	11	313	33.5	22
Lawrence MSA	25	57	-	12	94	10	4
Manhattan MSA	13	23	7	4	47	5	5.9
Salina MSA	40	57	19	5	121	13	12.7
Topeka MSA	19	69	-	5	93	10	35.8
Wichita MSA	74	173	4	15	266	28.5	19.6

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans (000's)*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
KS Non-MSA	4,201	7,138	12,170	7,534	31,043	15.5	22
Lawrence MSA	6,869	12,182	-	3,667	22,718	11.4	4
Manhattan MSA	2,930	1,141	1,110	2,997	8,178	4.1	5.9
Salina MSA	4,438	5,374	3,462	2,824	16,098	8	12.7
Topeka MSA	3,143	15,716	-	12,835	31,694	5.9	35.8
Wichita MSA	23,569	42,672	1,400	22,587	90,228	45.1	19.6

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

### KS Non-MSA

The following factors support the bank's good responsiveness to community credit needs:

- The bank's deposit market share is (13.1 percent) and is ranked second of 24 depository institutions in the AA.
- Competition for loans is moderate in the AA. There are a total of 194 residential mortgage lenders, 49 small business lenders, and 17 small farm lenders in the AA.
- The bank's market share (2.7 percent) and rank (7) for mortgage lending are below those for deposits in the AA. The ranking for mortgage lending is exceeds the rank for deposits when

considered in relation to the number of competitors. The deposit rank is in the 9<sup>th</sup> percentile and the bank's mortgage lending rank is in the 4<sup>th</sup> percentile.

- The bank's market share (15.7 percent) for small business lending exceeds the market share for deposits and the rank (2) for small business lending equals the rank for deposits. When considered in relation to the number of competitors, the bank's small business lending rank (5<sup>th</sup> percentile) exceeds the rank for deposits.
- Small farm lending is not a strategic focus for the bank and the market share (10 percent), and rank (3) are near to those for deposits. The rank for small farm lending (18<sup>th</sup> percentile) remains below the rank for deposits when considered in relation to the number of competitors.

#### Lawrence MSA

The following factors support the bank's good responsiveness to community credit needs:

- The bank, with deposit market share of 1.1 percent, is ranked 17 of 22 depository institutions in the AA.
- Competition for loans is significant in the AA. There are a total of 279 residential mortgage lenders and 73 small business lenders in the AA.
- The bank's market share (0.2 percent) and rank (74) for mortgage lending are significantly below those for deposits in the AA. The ranking for mortgage lending is significantly stronger than the rank for deposits when considered in relation to the number of competitors. The deposit rank is in the 78<sup>th</sup> percentile and the bank's mortgage lending rank is in the 27<sup>th</sup> percentile.
- The bank's market share (1.1 percent) and rank (17) for small business lending are equal to those for deposits. When considered in relation to the number of competitors, the bank's small business lending rank (24<sup>th</sup> percentile) is well above the deposit rank.

#### Topeka MSA

The following factors support the bank's adequate responsiveness to community credit needs:

- The bank's deposit market share is (6.8 percent) and the market share is ranked 4 of 20 depository institutions in the AA.
- Competition for loans is significant in the AA. There are a total of 274 residential mortgage lenders and 70 small business lenders in the AA.
- The bank's market share (0.2 percent) and rank (64) for mortgage lending are significantly below those for deposits in the AA. The ranking for mortgage lending is near to the rank for deposits when considered in relation to the number of competitors. The deposit rank is in the 21<sup>st</sup> percentile and the bank's mortgage lending rank is in the 24<sup>th</sup> percentile.
- The bank's market share (1 percent) and rank (17) for small business lending are significantly below those for deposits. When considered in relation to the number of competitors, the bank's small business lending rank (25<sup>th</sup> percentile) is near to the deposit rank.

### **Distribution of Loans by Income Level of the Geography**

The bank exhibits a good geographic distribution of loans in its AAs.

#### ***Home Mortgage Loans***

Refer to table O of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

KS Non-MSA

The geographic distribution of the bank's home mortgage lending was poor. The proportion of loans was well below the percentage of owner-occupied housing units in moderate-income geographies and the aggregate. There were no low-income geographies in the AA.

Lawrence MSA

The geographic distribution of the bank's home mortgage lending was adequate. The proportion of loans exceeds the percentage of owner-occupied housing units in low-income geographies and the aggregate. The proportion of loans was well below the percentage of owner-occupied housing units in moderate-income geographies and the aggregate.

Topeka MSA

The bank did not originate enough home mortgage loans in the AA to perform a meaningful analysis.

***Small Loans to Businesses***

Refer to table Q of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

KS Non-MSA

The geographic distribution of the bank's small loans to businesses was good. The proportion of loans was well below the percentage of businesses in moderate-income geographies and exceeds the aggregate. There were no low-income geographies in the AA.

Lawrence MSA

The geographic distribution of the bank's small loans to businesses was very poor. The proportion of loans was significantly below both the percentage of businesses in low- and moderate-income geographies and the aggregates for both income categories.

Topeka MSA

The geographic distribution of the bank's small loans to businesses was good. The proportion of loans was below the percentage of businesses in low-income geographies and somewhat near to the aggregate. The proportion of loans exceeds the percentage of businesses in moderate-income geographies and exceeds the aggregate.

***Small Loans to Farms***

Refer to table S of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

KS Non-MSA

The geographic distribution of the bank's small loans to farms was adequate. The proportion of loans was below the percentage of farms in moderate-income geographies and the aggregate. There were no low-income geographies in the AA. The fact that these loans are not a strategic focus for the bank was taken into consideration.

***Lending Gap Analysis***

Maps of the bank's lending, supervisory data, and other summary reports were reviewed. No unexplained conspicuous gaps in the bank's lending within the rating area were noted.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibits an adequate distribution of loans among individuals of different income levels and business and farms of different sizes.

#### ***Home Mortgage Loans***

Refer to table P of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

#### **KS Non-MSA**

The borrower distribution of the bank's home mortgage lending was good. The proportion of loans was below the percentage of low-income families and exceeds the aggregate. The proportion of loans exceeds the percentage of moderate-income families and exceeds the aggregate.

#### **Lawrence MSA**

The borrower distribution of the bank's home mortgage lending was adequate. The proportion of loans was below the percentage of low-income families and exceeds the aggregate. The proportion of loans was below the percentage of moderate-income families and the aggregate.

#### **Topeka MSA**

The bank did not originate enough home mortgage loans in the AA to perform a meaningful analysis.

#### ***Small Loans to Businesses***

Refer to table R 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.

#### **KS Non-MSA**

The borrower distribution of small loans to business was adequate, based upon consideration of performance context information discussed in the front section of the PE. During the evaluation period, UMB made 44.6 percent of its small loans to businesses in the AA without revenue information. The percentage of bank loans in 2020 and 2021 to businesses with revenues less than \$1 million was significantly below the percentage of businesses and the aggregate industry distribution of loans to those businesses. However, we gave positive consideration for the bank's responsiveness to the needs created by the COVID-19 pandemic by making a significant volume of PPP lending without revenue information.

#### **Lawrence MSA**

The borrower distribution of small loans to business was adequate, based upon consideration of performance context information discussed in the front section of the PE. UMB made 15.8 percent of its small loans to businesses during the evaluation period without revenue information. The percentage of bank loans in 2020 and 2021 to businesses with revenues less than \$1 million was significantly below the percentage of businesses and the aggregate industry distribution of loans to those businesses.



However, we gave positive consideration for the bank's responsiveness to the needs created by the COVID-19 pandemic by making a significant volume of PPP lending without revenue information.

#### Topeka MSA

The borrower distribution of small loans to business was adequate, based upon consideration of performance context information discussed in the front section of the PE. During the evaluation period, the bank made 23.2 percent of its small loans to businesses in the AA without revenue information. The percentage of bank loans in 2020 and 2021 to businesses with revenues less than \$1 million was significantly below the percentage of businesses and the aggregate industry distribution of loans to those businesses. However, we gave positive consideration for the bank's responsiveness to the needs created by the COVID-19 pandemic by making a significant volume of PPP lending without revenue information.

#### ***Small Loans to Farms***

Refer to table T of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

#### KS Non-MSA

Based on those farms with known revenues, the borrower distribution of the bank's loans to small loans to farms by revenue was good. The proportion of loans was somewhat near to the percentage of small farms and exceeds the aggregate.

### **Community Development Lending**

The bank is a leader in making CD loans which had a positive impact in the overall Lending Test rating in the rating area.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

#### KS Non-MSA

The bank originated 11 loans totaling \$7.5 million and representing 39.1 percent of allocated tier one capital. The bank utilized CD lending opportunities to meet identified credit needs. The bank made seven loans totaling \$7.5 million to address an identified community need of supporting family farms.

#### Lawrence MSA

The bank originated 12 loans totaling \$3.7 million to address an identified community need of supporting economic development. The loans represent 106.2 percent of allocated tier one capital.

#### Topeka MSA

The bank originated five loans totaling \$12.8 million and representing 41.1 percent of allocated tier one capital. The bank utilized CD lending opportunities to meet identified credit needs. The bank's supported affordable housing, an identified community need (2 loans totaling \$10.4 million).

Additionally, the bank made 29 loans benefiting the broader statewide area totaling \$38.4 million without a P/M/F to benefit the bank's AAs.

## **Product Innovation and Flexibility**

The bank makes adequate use of innovative and/or flexible lending practices to serve AA credit needs. Refer to Overall CRA Rating – Product Innovation and Flexibility for more detail.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank’s performance under the Lending Test in the Salina MSA is consistent with the bank’s overall performance under the Lending Test in the full-scope areas. Based on limited-scope reviews, the bank’s performances under the Lending Test in the Manhattan MSA and Wichita MSA are weaker than the bank’s overall performance under the Lending Test in the full-scope areas due to weaker borrower distribution. The impact from the weaker performance in the Manhattan and Wichita MSAs is minimal because of the bank’s small presence in both AAs.

Refer to tables O through T of Appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

The bank’s performance under the Investment Test in Kansas is rated Outstanding.

## **Conclusions for Areas Receiving Full-Scope Reviews**

Based on full-scope reviews, the bank’s performances in Lawrence and Topeka MSAs are excellent and performance in the Kansas Non-MSA is good.

The bank has an excellent level of qualified CD investments, grants, and donations, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits excellent responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives. Majority of investments support affordable housing.

## Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Kansas Non-MSA	3	957	21	443	24	16.6	1,400	7.8	0	0
Lawrence MSA	1	1,000	7	463	8	5.5	1,463	8.2	0	0
Manhattan MSA	1	45	13	1,501	14	9.7	1,546	8.6	0	0
Salina MSA	4	290	25	3,478	29	20.0	3,768	21.0	0	0
Topeka MSA	12	1,867	26	3,401	38	26.2	5,268	29.4	0	0
Wichita MSA	4	610	28	3,878	32	22.1	4,488	25.0	0	0

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

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

### KS Non-MSA

Considering the number of competitors in the market the bank's level of qualified CD investment relative to investment opportunities and capacity in the AA is good. The bank made 24 investments, donations, and grants totaling approximately \$1.4 million. This includes three prior period investments totaling \$957,000 and two current period investments totaling \$411,000. Additionally, the bank made 19 grants and donations totaling \$32,000. The bank's total investments represent 9.2 percent of allocated tier 1 capital. The bank's CD investments were responsive to affordable housing needs, primarily through the purchase of MBSs supporting LMI individuals.

Examples of investments made during the valuation period include:

- A \$675,000 LIHTC investment promoting affordable housing and benefiting the AA.
- Two MBSs totaling \$411,000 for affordable housing for LMI individuals in Russell and Bourbon Counties.
- A \$2,000 donation to a corporation that provides after school programming and childcare services to LMI families.

### Lawrence MSA

Considering the number of competitors in the market the bank's level of qualified CD investment relative to investment opportunities and capacity in the AA is excellent. The bank made eight investments, grants, and donations totaling \$1.5 million. This includes one prior period investment totaling \$1 million and two current period investments totaling \$ 442,530. Additionally, the bank made five grants and donations totaling \$20,273. The bank's total investments represented 43.4 percent of allocated tier 1 capital. The bank's CD investments were responsive to affordable housing needs, primarily through the purchase of MBSs supporting LMI individuals.

Examples of investments made during the valuation period include:

- Two investments in MBSs to LMI borrowers benefitting the AA.
- Four grants totaling \$20,000 to two nonprofit organizations supporting mental and physical health services where a majority of those served are LMI individuals.

Topeka MSA

Considering the number of competitors in the market the bank’s level of qualified CD investment relative to investment opportunities and capacity in the AA is excellent. The bank made 38 investments, grants, and donations totaling approximately \$5.3 million. This includes 12 prior period investments totaling \$1.9 million and 12 current period investments totaling \$3.3 million. Additionally, the bank made 14 grants and donations totaling \$77,000. The bank’s total investments represented 14.7 percent of allocated tier 1 capital. The bank’s CD investments were responsive to affordable housing needs, primarily through investing in MBSs and LIHTCs supporting LMI individuals.

Examples of investments made during the valuation period include:

- The bank invested \$2.6 million in an MBS supporting affordable housing, which includes 20 loans to LMI borrowers within the AA.
- A \$750,000 LIHTC investment to create and maintain safe, affordable housing units for LMI individuals.

**Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank’s performance under the Investment Test in the Manhattan MSA, Salina MSA, and Wichita MSA is consistent with the bank’s overall performance under the Investment Test in the full-scope areas.

**SERVICE TEST**

The bank’s performance under the Service Test in the state of Kansas is rated Low Satisfactory.

**Conclusions for Areas Receiving Full-Scope Reviews**

Based on full-scope reviews, the bank’s performance in the Kansas Non-MSA is excellent. Based on full-scope reviews, the bank’s performance in the Lawrence MSA and Topeka MSA AAs are adequate.

**Retail Banking Services**

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank’s AA.

Distribution of Branch Delivery System				
	Deposits	Branches		Population
	% of Rated Area	% of Rated	Location of Branches by Income of Geographies (%)	% of Population within Each Geography

Assessment Area	Deposits in AA	# of BANK Branches	Area Branches in AA	Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Kansas Non-MSA	22.1	2	22.2	0.0	50.0	50.0	0.0	0.0	8.7	82.7	8.6
Lawrence MSA	4.0	1	11.1	0.0	0.0	0.0	100.0	10.2	29.2	31.9	28.6
Manhattan MSA	5.9	1	11.1	0.0	100.0	0.0	0.0	0.0	14.5	47.1	34.8
Salina MSA	12.7	1	22.2	0.0	100.0	0.0	0.0	0.0	34.8	23.6	41.6
Topeka MSA	35.8	1	11.1	0.0	0.0	100.0	0.0	8.2	18.8	39.7	33.3
Wichita MSA	19.6	2	22.2	0.0	50.0	50.0	0.0	9.3	24.9	28.5	37.2

### KS Non-MSA

There are no low-income CTs in the AA. The percentage of branches located in moderate- income areas exceed the percentage of the population residing in these geographies. Additionally, two branches in middle-income geographies enhance accessibility to bank products and services for residents in moderate-income areas. Bank management provided analysis and data showing bank deposit customers being served in the LMI CTs. This contributed positively to the conclusion on the bank's branch distribution in the Kansas Non-MSA AA. The branch distribution in the AA is excellent.

UMB complements its traditional service delivery systems with alternative delivery systems, including online banking, mobile banking, text banking, deposit-taking ATMs, and digital account opening. These services are available to retail and business customers throughout the bank's AAs. No significant weight was placed on these services, as no analysis and data were available to determine the impact of the alternative delivery systems on bank customers.

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. Services offered and branch hours are comparable among locations regardless of the income level of the area.

### Lawrence MSA

UMB has only one branch located in the Lawrence MSA AA and has 0.4 percent of total bank deposits in the AA. The single branch is located in an upper-income geography. Based upon the very limited presence of the bank in the Lawrence MSA AA, the branch distribution is adequate.

UMB complements its traditional service delivery systems with alternative delivery systems, including online banking, mobile banking, text banking, deposit-taking ATMs, and digital account opening. These services are available to retail and business customers throughout the bank's AAs. No significant weight was placed on these services, as no analysis and data were available to determine the impact of the alternative delivery systems on bank customers.

The bank did not open or close branches during the evaluation period.

The bank has one branch location in the AA. Services, including where appropriate, business hours, do not vary in this branch from those in branches in other AAs within the state of Kansas. Services offered and branch hours are comparable among locations regardless of the income level of the area.

### Topeka MSA

UMB has only one branch in the Topeka MSA AA but has 35.8 percent of total state deposits in the AA. The single branch is located in a middle-income geography. Although the bank has a very limited branch presence in the Topeka MSA AA, it has a large deposit base, exceeding the deposits in the other AAs within the state. Based upon the very limited presence of the bank in the Topeka MSA AA, the branch distribution is adequate.

UMB complements its traditional service delivery systems with alternative delivery systems, including online banking, mobile banking, text banking, deposit-taking ATMs, and digital account opening. These services are available to retail and business customers throughout the bank's AAs. No significant weight was placed on these services, as no analysis and data were available to determine the impact of the alternative delivery systems on bank customers.

The bank did not open or close branches during the evaluation period.

The bank has one branch location in the AA. Services, including where appropriate, business hours, do not vary in this branch from those in branches in other AAs within the state of Kansas. Services offered and branch hours are comparable among locations regardless of the income level of the area.

## **Community Development Services**

The bank provides an adequate level of CD services.

### KS Non-MSA

The bank provides an adequate level of CD services. The level of services is inconsistent with the bank's capacity and expertise to conduct specific activities. CD services in the AA were performed by two individuals who participated in 15 activities, performing 15 hours of community service activities at one organization. All CD services completed by employees were community service volunteer activities. Both employees that participated in CD services, served either as board members for a CD organization.

Examples of qualified CD services in the AA include:

- One employee served 12 hours as a board member of an organization that conducts fundraising campaigns to support nonprofit organizations that serve a majority LMI families.
- One employee served three hours as a board member of an organization that raises funds to support local nonprofit organization providing affordable housing.

### Lawrence MSA

The bank provided no CD services, which is inconsistent with its capacity and expertise to conduct specific activities.

### Topeka MSA

The bank provides an adequate level of CD services. The level of CD services is inconsistent with the bank's capacity and expertise to conduct specific activities. The bank reported 13 service hours. This was completed by two employees, performing two community service activities, at two organizations. No employees served as board or committee members.

An example of qualified CD service in the AA include:

- An employee served five hours as a committee member assisting an organization in the approval process of LIHTCs.
- An employee served eight hours as a committee member for a nonprofit organization that supports children with disabilities.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the Wichita MSA is consistent with the bank's overall performance under the Service Test in the full-scope areas. Based on limited-scope reviews, the bank's performance under the Service Test in the Manhattan MSA and Salina MSA is stronger than the bank's overall performance under the Service Test in the full-scope areas. The stronger performance is due to a stronger branch distribution which did not impact the overall service test conclusion.

## State Rating

### State of Missouri

<b>CRA rating for the State of Missouri:</b>	Outstanding
<b>The Lending Test is rated:</b>	Outstanding
<b>The Investment Test is rated:</b>	Outstanding
<b>The Service Test is rated:</b>	High Satisfactory

The major factors that support this rating include:

- Lending levels reflect good responsiveness to credit needs in its AAs;
- The bank exhibits a good geographic distribution of loans in its AAs;
- The bank exhibits an adequate distribution of loans among individuals of different income levels and businesses of different sizes;
- The bank is a leader in originating CD loans and was responsive to community needs which had a positive impact on the Lending Test conclusion;
- The bank has an excellent level of CD investments and grants;
- Service delivery systems are accessible to geographies and individuals of different income levels in the AAs; and
- The bank provides a significant level of CD services.

### Description of Bank's Operations in Missouri

The bank has five AAs within the state. These include the Columbia MSA, Jefferson City MSA, Joplin MSA, Missouri Non-MSA (MO Non-MSA), and Springfield MSA. The bank chose full counties in all AAs. The bank offers a full range of loan and deposit products and services in its AA through its branches within the rating area.

Refer to Appendix A: Scope of the Examination – List of Assessment Areas and Type of Examination for the counties used to form the AAs.

#### Columbia MSA

Based on FDIC deposit market share data as of June 30, 2022, the bank had \$141.5 million in deposits representing a 2.2 percent deposit market share in the AA and is ranked ninth out of 25 financial banks doing business in the AA. The deposits account for 0.4 percent of the total bank deposits. The largest depository institutions include Central Bank of Boone County, Simmons Bank, Commerce Bank, and Bank of America.

The bank originated and purchased 1.2 percent of total bank loans in the AA. Home mortgages represented 46.8 percent and small business loans represented 45.2 percent of lending in the AA.



MO Non-MSA

Based on FDIC deposit market share data as of June 30, 2022, the bank had \$231.6 million in deposits representing a 6.9 percent deposit market share in the AA and is ranked fourth out of 28 financial banks doing business in the AA. The deposits account for 9.0 percent of the total bank deposits. The largest depository institutions include Freedom Bank of Southern Missouri, Hawthorn Bank, and Equity Bank.

The bank originated and purchased 1.9 percent of total bank loans in the AA. Home mortgages represented 31.9 percent, loans to small businesses represented 45.9 percent, and loans to small farm represented 21.3 percent of lending in the AA.

Springfield MSA

Based on FDIC deposit market share data as of June 30, 2022, the bank had \$190.3 million in deposits representing a 1.6 percent deposit market share in the AA and is ranked 15<sup>th</sup> out of 29 financial banks doing business in the AA. The deposits account for 0.8 percent of the total bank deposits. The largest depository institutions include Great Southern, Commerce, Central Bank of the Ozarks, Oakstar, and Bank of America.

The bank originated and purchased 1.5 percent of total bank loans in the AA. Home mortgages represented 48.9 percent and loans to small businesses represented 51.1 percent of lending in the AA.

Columbia MSA

Examiners performed three community contacts during the evaluation to identify community needs. The community contacts focused on agriculture, business development, workforce development, and economic development. Community contacts identified the following credit and CD needs in the AA:

- Affordable housing
- Economic development
- Financial education
- Workforce development

MO Non-MSA

To determine needs within the community, examiners performed three community contacts during the evaluation period. One of the community contacts focused on economic development, one contact focused on small business development, and one of the contacts was a government regulatory agency. Community contacts identified the following credit and CD needs in the AA:

- Affordable housing
- Agricultural credit
- Commercial credit
- Financial education and literacy at an early age
- A product to increase credit scores

Springfield MSA

Examiners performed three community contacts during the evaluation period to identify needs within the Springfield MSA AA. Two of the contacts were government agencies with one focused on economic development and the second government agency focused on affordable housing. The third contact focused on economic development. The community contacts identified the following community needs within the AA:

- Supporting local organizations that assist in community development
- Small business development
- Site development lending

Additionally, bank management performed its own assessment to identify community needs. Management identified affordable housing, healthcare services, youth services, childcare services, and after-school programs as community needs within the AA.

The following table provides information on the demographic composition of the bank’s full-scope AA(s).

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Columbia MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	34	8.8	14.7	47.1	20.6	8.8
Population by Geography	188,363	3.8	11.1	52.3	26.0	6.8
Housing Units by Geography	79,646	4.4	11.9	53.4	26.2	4.0
Owner-Occupied Units by Geography	42,106	1.5	8.4	60.0	29.8	0.4
Occupied Rental Units by Geography	31,362	8.0	16.3	44.6	22.6	8.5
Vacant Units by Geography	6,178	6.6	14.0	53.3	20.7	5.4
Businesses by Geography	14,791	8.8	11.9	46.4	26.6	6.3
Farms by Geography	676	1.6	7.8	74.9	14.9	0.7
Family Distribution by Income Level	42,577	20.5	17.0	21.6	40.9	0.0
Household Distribution by Income Level	73,468	25.9	14.9	16.1	43.0	0.0
Median Family Income MSA – 17860 Columbia, MO MSA		\$69,408	Median Housing Value			\$162,780
			Median Gross Rent			\$789
			Families Below Poverty Level			9.2%

*Source: 2015 ACS and 2021 D&B Data  
Due to rounding, totals may not equal 100.0%  
(\* The NA category consists of geographies that have not been assigned an income classification.*

One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant’s income or a maximum monthly mortgage payment of \$868 for low-income borrowers and \$1,388 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner’s insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$1,342. Housing is considered unaffordable for low-income borrowers. Based on information in the table above and analysis performed using the information, low-income families would be challenged to afford a mortgage in the AA.

According to the September 2022 Moody’s Analytics report, the AA strengths are high educational attainment for the workforce, university-sponsored research, a critical incubator of new business, steady base of students to drive consumer activity, and central location in Missouri and the U.S., with

competitive business costs. The AA’s growth is decelerating in the near term and will continue in the long-term. The 2022 unemployment rate for the AA was 2.4 percent compared to 4.3 percent in 2020. The leading industries by wage tier include federal government, management of companies and enterprises, offices of physicians, and offices of dentists. Major employers include University of Missouri-Columbia, University Hospital and Clinics, Veterans United Home Loans, Harry S. Truman Veteran’s Hospital, and Boone Hospital Center.

<b>A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: MO Non-MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	31	0.0	9.7	80.6	9.7	0.0
Population by Geography	127,259	0.0	7.4	81.7	10.9	0.0
Housing Units by Geography	65,320	0.0	12.4	77.9	9.7	0.0
Owner-Occupied Units by Geography	37,659	0.0	9.0	80.2	10.8	0.0
Occupied Rental Units by Geography	12,565	0.0	5.3	83.4	11.3	0.0
Vacant Units by Geography	15,096	0.0	26.5	67.6	5.9	0.0
Businesses by Geography	8,074	0.0	8.5	80.2	11.3	0.0
Farms by Geography	710	0.0	3.8	82.8	13.4	0.0
Family Distribution by Income Level	34,163	19.4	19.7	21.5	39.4	0.0
Household Distribution by Income Level	50,224	22.0	17.7	19.1	41.2	0.0
Median Family Income Non-MSAs – MO		\$48,341	Median Housing Value			\$105,850
			Median Gross Rent			\$593
			Families Below Poverty Level			13.9%
<i>Source: 2015 ACS and 2021 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(* The NA category consists of geographies that have not been assigned an income classification.</i>						

One method used to assess housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant’s income or a maximum monthly mortgage payment of \$604 for low-income borrowers and \$967 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner’s insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be \$958. Based on the information in the table above and analysis of that information, low-income families would be challenged to afford a mortgage in the AA.

According to the September 2022 Moody’s Analytics report, the AA strengths are a stable source of income and spending from Missouri State University, investments by Amazon in its logistics center, and low business and living costs. The AA’s growth is lagging in the near term and will continue in the long-term. The 2022 unemployment rate for the AA was 2.5 percent compared to 5.3 percent in 2020. The leading industries by wage tier include offices of physicians, federal government, computer systems design and related services, and dairy product manufacturing. Major employers include Cox Health Systems, Mercy Health Springfield Community, Walmart Inc., Bass Pro Shops, and Missouri State University.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Springfield MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	62	8.1	30.6	40.3	19.4	1.6
Population by Geography	283,206	6.0	25.3	43.4	23.7	1.6
Housing Units by Geography	128,166	6.8	26.9	43.2	22.5	0.6
Owner-Occupied Units by Geography	68,906	3.6	16.9	47.6	31.9	0.0
Occupied Rental Units by Geography	48,826	10.5	38.8	38.4	11.1	1.3
Vacant Units by Geography	10,434	10.1	37.3	37.1	14.2	1.3
Businesses by Geography	24,133	3.3	30.5	41.9	23.9	0.4
Farms by Geography	761	2.9	15.5	52.3	29.3	0.0
Family Distribution by Income Level	69,698	21.4	18.2	20.3	40.0	0.0
Household Distribution by Income Level	117,732	23.9	17.9	17.9	40.3	0.0
Median Family Income MSA – 44180 Springfield, MO MSA		\$54,948	Median Housing Value			\$129,552
			Median Gross Rent			\$702
			Families Below Poverty Level			13.0%
<i>Source: 2015 ACS and 2021 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

One method used to assess the affordability of housing in the AA is to assume a maximum monthly principal and interest payment of no more than 30 percent of the applicant’s income or a maximum monthly mortgage payment of \$687 for low-income borrowers and \$1,099 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner’s insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$1,181. Based on the information in the table above and the analysis of that information, LMI families would be challenged to afford a mortgage in the AA.

According to the September 2022 Moody’s Analytics report, the AA strengths are Missouri State University provides stable source of income and spending, Amazon continues to invest in its logistics center, and low business and living costs. The AA’s growth is lagging in the near term and will continue in the long-term. The 2022 unemployment rate for the AA was 2.5 percent compared to 5.3 percent in 2020. The leading industries by wage tier include offices of physicians, federal government, computer systems design and related services, and dairy product manufacturing. Major employers include Cox Health Systems, Mercy Health Springfield Community, Walmart Inc., Bass Pro Shops, and Missouri State University.

## Scope of Evaluation in Missouri

The Columbia MSA, MO Non-MSA, and Springfield MSA each received a full-scope review. The three AAs account for 88.4 percent of loans, 72.7 percent of branches, and 68 percent of deposits in

the state throughout the evaluation period. All remaining AAs received limited-scope reviews. Bank delineated AAs located in the same MSA are combined, analyzed, and presented as one AA for purposes of this evaluation. Refer to Appendix A – Scope of Examination, for a list of all AAs under review. More weight was given to the small loans to businesses and home mortgage than to the loans to small farms conclusions in the MO Non-MSA. Equal weight was given to home mortgage and small business loans in the Columbia MSA and Springfield MSA.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MISSOURI

### LENDING TEST

The bank's performance under the Lending Test in Missouri is rated Outstanding.

### Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Columbia MSA, MO Non-MSA, and Springfield MSA is good.

### Lending Activity

Lending levels reflect good responsiveness to AA credit needs considering the number and dollar amount of home mortgage, small business, and small farm loans relative to the bank's lending capacity based on deposits, competition, and market presence.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Columbia MSA	88	85	15	5	193	22.8	13.7
Jefferson City MSA	14	29	0	2	45	5.4	7
Joplin MSA	24	25	3	0	52	6.2	25.5
MO Non-MSA	96	141	64	4	305	36.3	31.6
Springfield MSA	116	121	0	9	246	29.3	22.2

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans(000's)*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Columbia MSA	34,326	9,095	2,345	3,877	49,643	21.4	13.7
Jefferson City MSA	2,710	9,235	0	4,049	5,994	6.9	7
Joplin MSA	4,458	4,749	305	0	9,512	4.1	25.5
MO Non-MSA	10,130	9,626	9,454	4,034	33,244	14.2	31.6

Springfield MSA	77,797	22,283	0	23,908	123,988	53.4	22.2
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\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

### Columbia MSA

The following factors support the bank's good responsiveness to community credit needs:

- The bank, with deposit market share of 2.4 percent, is ranked 8 of 36 depository institutions in the AA.
- Competition for loans is significant in the AA. There are a total of 315 residential mortgage lenders and 82 small business lenders in the AA.
- The bank's market share (0.4 percent) and rank (42) for mortgage lending are significantly below those for deposits in the AA. The ranking for mortgage lending is well above the rank for deposits when considered in relation to the number of competitors. The deposit rank is in the 23<sup>rd</sup> percentile and the bank's mortgage lending rank is in the 14<sup>th</sup> percentile.
- The bank's market share (0.9 percent) and rank (18) for small business lending are well below those for deposits. When considered in relation to the number of competitors, the bank's small business lending rank (23<sup>rd</sup> percentile) is equal to the deposit rank.

### MO Non-MSA

The following factors support the bank's good responsiveness to community credit needs:

- The bank, with deposit market share of 7.4 percent, is ranked 4 of 28 depository institutions in the AA.
- Competition for loans is significant in the AA. There are a total of 311 residential mortgage lenders and 74 small business lenders in the AA.
- The bank's market share (1 percent) and rank (26) for mortgage lending are significantly below those for deposits in the AA. The ranking for mortgage lending is well above the rank for deposits when considered in relation to the number of competitors. The deposit rank is in the 15<sup>th</sup> percentile and the bank's mortgage lending rank is in the 9<sup>th</sup> percentile.
- The bank's market share (3.3 percent) and rank (10) for small business lending are significantly below those for deposits. When considered in relation to the number of competitors, the bank's small business lending rank (14<sup>th</sup> percentile) is near to the deposit rank.
- Small farm lending is not a strategic focus for the bank and the market share (2.7 percent), and rank (8) are significantly below those for deposits and reflect the bank's primary focus on small business and residential mortgage lending. The rank for small farm lending (25<sup>th</sup> percentile) remains significantly below the rank for deposits when considered in relation to the number of competitors.

### Springfield MSA

The following factors support the bank's good responsiveness to community credit needs:

- The bank, with deposit market share of 2.1 percent, is ranked 17 of 29 depository institutions in the AA.
- Competition for loans is significant in the AA. There are a total of 346 residential mortgage lenders and 95 small business lenders in the AA.
- The bank's market share (0.3 percent) and rank (60) for mortgage lending are significantly below those for deposits in the AA. The ranking for mortgage lending is significantly above the rank for

deposits when considered in relation to the number of competitors. The deposit rank is in the 59<sup>th</sup> percentile and the bank's mortgage lending rank is in the 18<sup>th</sup> percentile.

- The bank's market share (0.7 percent) and rank (24) for small business lending are below those for deposits. When considered in relation to the number of competitors, the bank's small business lending rank (26<sup>th</sup> percentile) well above to the deposit rank.

## **Distribution of Loans by Income Level of the Geography**

The bank exhibits a good geographic distribution of loans in its AAs.

### ***Home Mortgage Loans***

Refer to table O of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

#### Columbia MSA

The geographic distribution of the bank's home mortgage lending was good. The proportion of loans exceeds the percentage of owner-occupied housing units in low-income geographies and the aggregate. The proportion of loans was below the percentage of owner-occupied housing units in moderate-income geographies and well below the aggregate.

#### MO Non-MSA

The geographic distribution of the bank's home mortgage lending was excellent. The proportion of loans exceeds the percentage of owner-occupied housing units in moderate-income geographies and the aggregate. There were no low-income geographies in the AA.

#### Springfield MSA

The geographic distribution of the bank's home mortgage lending was adequate. The proportion of loans exceeds the percentage of owner-occupied housing units in low-income geographies and the aggregate. The proportion of loans was significantly below the percentage of owner-occupied housing units in moderate-income geographies and well below the aggregate.

### ***Small Loans to Businesses***

Refer to table Q of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

#### Columbia MSA

The geographic distribution of the bank's small loans to businesses was good. The proportion of loans was below the percentage of businesses in low-income geographies and well below the aggregate. The proportion of loans exceeds the percentage of businesses in moderate-income geographies and the aggregate.

#### MO Non-MSA

The geographic distribution of the bank's small loans to businesses was excellent. The proportion of loans exceeds the percentage of businesses in moderate-income geographies and exceeds the aggregate. There were no low-income geographies in the AA.

Springfield MSA

The geographic distribution of the bank's small loans to businesses was excellent. The proportion of loans exceeded both the percentage of businesses in LMI geographies and the aggregate.

*Small Loans to Farms*

Refer to table S of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

MO Non-MSA

The geographic distribution of the bank's small loans to farms was excellent. The proportion of loans exceeds the percentage of farms in moderate-income geographies and the aggregate. There were no low-income geographies in the AA.

*Lending Gap Analysis*

Maps of the bank's lending, supervisory data, and other summary reports were reviewed. No unexplained conspicuous gaps in the bank's lending within the rating area were noted.

**Distribution of Loans by Income Level of the Borrower**

The bank exhibits an adequate distribution of loans among individuals of different income levels and business, and farms of different sizes.

*Home Mortgage Loans*

Refer to table of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Columbia MSA

The borrower distribution of the bank's home mortgage lending was good. The proportion of loans was significantly below the percentage of low-income families and near to the aggregate. The proportion of loans near to the percentage of moderate-income families and the aggregate.

MO Non-MSA

The borrower distribution of the bank's home mortgage lending was good. The proportion of loans was well below the percentage of low-income families and exceeds the aggregate. The proportion of loans was somewhat near to the percentage of moderate-income families and somewhat near to the aggregate.

Springfield MSA

The borrower distribution of the bank's home mortgage lending was good. The proportion of loans was significantly below the percentage of low-income families and well below the aggregate. The proportion of loans was near to the percentage of moderate-income families and somewhat near to the aggregate.

*Small Loans to Businesses*

Refer to table R 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.



Columbia MSA

The borrower distribution of small loans to businesses was adequate, based upon consideration of performance context information discussed in the front section of the PE. UMB did not collect revenue information on 35.3 percent of its small loans to businesses in the Columbia MSA. The significant volume of loans without revenue information resulted in the percentage of bank loans in 2020 and 2021 to businesses with revenues less than \$1 million being significantly below the percentage of businesses and the aggregate industry distribution of loans to those businesses. However, we gave positive consideration for the bank's responsiveness to the needs created by the COVID-19 pandemic by making a significant volume of PPP lending without revenue information.

MO Non-MSA

The borrower distribution of small loans to business was adequate, based upon consideration of performance context information discussed in the front section of the PE. The bank did not collect revenue information in the underwriting of 46.8 percent of its small loans to businesses in the MO Non-MSA AA. The percentage of bank loans in 2020 and 2021 to businesses with revenues less than \$1 million was significantly below the percentage of businesses and the aggregate industry distribution of loans to those businesses. However, we gave positive consideration for the bank's responsiveness to the needs created by the COVID-19 pandemic by making a significant volume of PPP lending without revenue information.

Springfield MSA

The borrower distribution of small loans to business was adequate, based upon consideration of performance context information discussed in the front section of the PE. The bank did not collect revenue information on 28.1 percent the small loans underwritten in the Springfield MSA AA during the evaluation period. The percentage of bank loans in 2020 and 2021 to businesses with revenues less than \$1 million was significantly below the percentage of businesses and the aggregate industry distribution of loans to those businesses. However, we gave positive consideration for the bank's responsiveness to the needs created by the COVID-19 pandemic by making a significant volume of PPP lending without revenue information.

***Small Loans to Farms***

Refer to table T of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses. The bank did not originate enough small loans to farms in the Columbia and Springfield MSA AAs for a meaningful analysis.

MO Non-MSA

Based on those farms with known revenues, the borrower distribution of the bank's loans to small loans to farms by revenue was excellent. The proportion of loans was near to the percentage of small farms and exceeds the aggregate.

**Community Development Lending**

The bank is a leader in making CD loans which had a positive impact in the overall Lending Test rating in the state of Missouri.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

#### Columbia MSA

The bank originated five loans totaling \$3.9 million and representing 29.2 percent of allocated tier one capital. The bank utilized CD lending opportunities to meet identified credit needs. The bank supported identified CD needs of affordable housing (two loans totaling \$1.2 million) and economic development (three loans totaling \$2.7 million).

#### MO Non-MSA

The bank originated four loans totaling \$4 million and representing 13.1 percent of allocated tier one capital. The bank utilized CD lending opportunities to meet identified credit needs. The bank's lending provided support to family farms (three loans totaling \$2.6 million) in response to an identified community need.

#### Springfield MSA

The bank originated nine loans totaling \$23.9 million and representing 110.6 percent of allocated tier one capital. The bank utilized CD lending opportunities to meet identified credit needs. The bank supported identified CD needs of affordable housing (two loans totaling \$5.4 million), economic development (five loans totaling \$14.3 million), and essential community facilities (one loan totaling \$2.2 million).

Additionally, the bank made 18 loans benefiting the broader statewide area totaling \$32.3 million without a P/M/F to benefit the bank's AAs.

### **Product Innovation and Flexibility**

The bank makes adequate use of innovative and/or flexible lending practices in order to serve AA credit needs. Refer to Overall CRA Rating – Product Innovation and Flexibility for more detail.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Lending Test in the Jefferson City MSA and Joplin MSA is weaker than the bank's overall performance under the Lending Test in the full-scope area(s) due to weaker geographic and borrower distributions, but the weaker performance did not result in a negative impact on the overall Lending Test rating.

Refer to tables O through T of Appendix D for the facts and data that support these conclusions.

### **INVESTMENT TEST**

The bank's performance under the Investment Test in Missouri is rated Outstanding.

### **Conclusions for Areas Receiving Full-Scope Reviews**

Based on full-scope reviews, the bank's performance in the Columbia MSA, MO Non-MSA, and Springfield MSA is excellent.

The bank made an excellent level of qualified CD investments, grants, and donations, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits good responsiveness to credit and community economic development needs. The bank rarely uses innovative and/or complex investments to support CD initiatives. Majority of investments support affordable housing.

### Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Columbia MSA	4	382	26	3,124	30	16.4	3,506	18.4	0	0
Jefferson City MSA	1	29	18	1,385	19	10.4	1,414	7.4	0	0
Joplin MSA	9	929	22	3,630	31	16.9	4,559	23.9	0	0
MO Non-MSA	12	2,075	37	758	49	26.8	2,833	14.9	0	0
Springfield MSA	6	2,270	48	4,483	54	29.5	6,753	35.4	0	0

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

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

#### Columbia MSA

Considering the number of competitors in the market the bank's level of qualified CD investment relative to investment opportunities and capacity in the AA is excellent. The bank made 30 investments, grants, and donations totaling approximately \$3.5 million. This includes four prior period investments totaling \$382,000 and 10 current period investments totaling \$3.1 million. Additionally, the bank made 16 grants and donations totaling \$23,000. The bank's total investments represented 24.7 percent of allocated tier 1 capital. The bank's CD investments were responsive to affordable housing needs, primarily through MBSs.

Some examples of investments include:

- The bank invested in an MBS supporting affordable housing with a total value of \$3 million, of which 21 loans are in the AA.
- A \$3,000 donation to a nonprofit organization supporting activities to aid people in moving out of poverty.

#### MO Non-MSA

Considering the number of competitors in the market the bank's level of qualified CD investment relative to investment opportunities and capacity in the AA is excellent. The bank made 49 investments, grants, and donations totaling approximately \$2.8 million. This includes 12 prior period investments

totaling \$2.1 million and three current period investments totaling \$668,000. Additionally, the bank made 34 grants and donations totaling \$89,000. The bank's total investments represented 12.2 percent of allocated tier 1 capital. The bank's CD investments were responsive to affordable housing needs, primarily through MBSs.

Some examples of investments include:

- A \$1.6 million investment in a bond for the acquisition, site development, construction, and equipping schools in a district where the majority of students receive free or reduced-cost lunch programs.
- An MBS of \$273,000 for affordable housing consisting of two loans to LMI borrowers.
- A \$2,000 donation to a program that offers an online platform to provide financial education to LMI people.

### Springfield MSA

Considering the number of competitors in the market the bank's level of qualified CD investment relative to investment opportunities and capacity in the AA is excellent. The bank made 54 investments, grants, and donations totaling approximately \$6.8 million. This includes six prior period investments totaling \$2.3 million and 13 current period investments totaling \$4.4 million. Additionally, the bank made 35 grants, and donations totaling \$75,000. The bank's total investments represented 35.4 percent of allocated tier 1 capital. The bank's CD investments were responsive to affordable housing needs, primarily through MBSs.

Some examples of investments include:

- An MBS for \$567,000 for affordable housing consisting of three loans to LMI borrowers.
- A tax credit of \$500,000 for a community fund aimed at supporting affordable housing.
- A \$2,000 donation to a program that provides an online platform providing financial education to LMI people.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Investment Test in Jefferson City MSA and Joplin MSA is consistent with the bank's overall performance under the Investment Test in the full-scope areas and provides support to the overall Investment Test rating of excellent for the state of Missouri rating area. .

## **SERVICE TEST**

The bank's performance under the Service Test in Missouri is rated High Satisfactory.

## **Conclusions for Areas Receiving Full-Scope Reviews**

Based on full-scope reviews, the bank's performance in the MO Non-MSA, and Springfield MSA is excellent. Based on full-scope reviews, the bank's performance in the Columbia MSA is adequate.

## Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the bank's AAs.

Distribution of Branch Delivery System											
Assessment Area	Deposits % of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Branches				Population			
				Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Columbia MSA	13.7	1	18.2	0.0	0.0	0.0	100.0	3.8	11.1	52.3	26.0
MO Non-MSA	31.6	4	36.4	0.0	25.0	75.0	0.0	0.0	7.4	81.7	10.9
Springfield MSA	22.2	2	18.2	0.0	100.0	0.0	0.0	6.0	25.3	43.4	23.7
Jefferson City MSA	7.0	1	9.1	0.0	0.0	0.0	100.0	3.1	11.5	43.3	42.1
Joplin MSA	25.5	2	18.2	0.0	100.0	0.0	0.0	0.0	17.9	65.4	16.7

### Columbia MSA

UMB has only one branch located in the Columbia MSA AA. The single branch is located in an upper-income geography. The bank has 0.1 percent of total bank deposits in the AA. The branch distribution in the AA is adequate when taking into consideration the bank's limited presence in the AA.

The bank complements its traditional service delivery systems with alternative delivery systems, including debit cards, telephone and online banking, electronic bill pays, and mobile banking options. These systems provide additional delivery availability and access to banking services to both retail and business customers. The OCC does not place significant weight on these services, as no data was available to determine their impact on LMI individuals.

### MO Non-MSA

There are no low-income CTs in the AA. The percentage of branches located in moderate-income areas exceeds the percentage of the population residing in these geographies. Additionally, the bank has one branch in a middle-income geography in proximity to serve a moderate-income area. Bank management provided analysis and data showing bank deposit customers being served in the moderate-income geographies which contributed positively to conclusions. Branch distribution in the AA is excellent.

UMB complements its traditional service delivery systems with alternative delivery systems, including online banking, mobile banking, text banking, deposit-taking ATMs, and digital account opening. These services are available to retail and business customers throughout the bank's AAs. No significant weight was placed on these services, as no analysis and data were available to determine the impact of the alternative delivery systems on bank customers.

Springfield MSA

There are no branches located in low-income areas. The percentage of branches located in moderate-income areas exceeds the percentage of the population residing in these geographies. The branch distribution in the AA is excellent.

UMB complements its traditional service delivery systems with alternative delivery systems, including online banking, mobile banking, text banking, deposit-taking ATMs, and digital account opening. These services are available to retail and business customers throughout the bank’s AAs. No significant weight was placed on these services, as no analysis and data were available to determine the impact of the alternative delivery systems on bank customers.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
MO Non-MSA	0	1			-1	

Columbia MSA

The bank did not open or close any branches in the AA during the evaluation period.

The bank has one branch location in the AA. Services, including where appropriate, business hours, do not vary in this branch from those in branches in other AAs within the state of Kansas. Services offered and branch hours are comparable among locations regardless of the income level of the area.

MO Non-MSA

The bank closed one branch in a middle-income geography during the evaluation period. To the extent changes have been made, the bank’s opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank closed one branch in a middle-income geography due to economic reasons and decreased transaction volume.

The bank has one branch location in the AA. Services, including where appropriate, business hours, do not vary in this branch from those in branches in other AAs within the state of Kansas. Services offered and branch hours are comparable among locations regardless of the income level of the area.

Springfield MSA

The bank did not open or close any branches in the AA during the evaluation period. Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. Services offered and branch hours are comparable among locations regardless of the income level of the area.

## **Community Development Services**

The bank provides a good level of CD services.

### Columbia MSA

The bank provides a low level of CD services. The level of services is inconsistent with the bank's capacity and expertise to conduct specific activities. Two bank employees assisted organizations that aid LMI young people and families with various programs.

### MO Non-MSA

The bank is a leader in providing CD services.

CD services in the AA include two individuals participating in two activities, performing 168 hours of community service activities at two organizations.

The following is an example of the CD services provided in the AA:

- An employee served 91 hours as a board member of an organization that supports economic development in LMI areas.
- An employee served 22 hours as a board member of a medical center where the majority of patients are LMI.

### Springfield MSA

The bank is a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities. Six bank employees either provided financial literacy training to LMI individuals, held board or committee positions, or provided technical assistance to qualifying organizations commensurate with their bank job duties.

Bank employees conducted presentations, taught courses, and provided technical assistance on finance and banking to community groups and LMI individuals. These services exhibited adequate responsiveness to identified needs in the AA. Bank employees volunteered 202 hours to seven organizations focused on financial literacy, revitalization activities, small business development, and affordable housing.

Examples of qualified CD services in the AA include:

- An employee served 120 hours on the board of a community service organization that served LMI individuals by aiding them with home ownership processes. The employee performed 120 hours of service for the organization.
- An employee served 36 hours on the board of an organization that aids disabled LMI individuals.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the Jefferson City MSA and the Joplin MSA is weaker than the bank's overall performance under the Service Test in the full-scope areas. The weaker performance is due to weaker branch distribution and did not affect overall Service Test conclusions.

## State Rating

### State of Nebraska

**CRA rating for the State of Nebraska:** Satisfactory

**The Lending Test is rated:** Low Satisfactory

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect good responsiveness to credit needs in the AA;
- The bank exhibits a poor geographic distribution of loans in the AA;
- The bank exhibits a poor distribution of loans among individuals of different income levels and businesses of different sizes;
- The bank is a leader in originating CD loans and was responsive to community needs which had a positive impact on the Lending Test conclusion;
- The bank has an excellent level of CD investments and grants;
- Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the AAs; and
- The bank provides an adequate level of CD services.

### Description of Bank's Operations in Nebraska

The bank has one AA, the Omaha MSA AA, within the state of Nebraska. The bank chose full counties in all AAs. The bank offers a full range of loan and deposit products and services in its AA through its branches within the rating area.

Refer to appendix A: Scope of the Examination – List of Assessment Areas and Type of Examination for the counties used to form the AAs.

Based on FDIC deposit market share data as of June 30, 2022, the bank had \$108.1 million in deposits representing a 0.4 percent deposit market share in the AA and is ranked 26th out of 38 financial banks doing business in the AA. The deposits account for 0.3 percent of the total bank deposits. The largest depository institutions include First National Bank of Omaha, Wells Fargo, U.S. Bank, and American National Bank.

The bank originated and purchased 0.8 percent of total bank loans in the AA. Home mortgages represented 40.6 percent and loans to small businesses represented 59.4 percent of lending in the AA.



Examiners performed four community contacts to identify community needs during the evaluation period. The community contacts focus on business development services, business coaching, affordable housing, mortgage insurance programs, and community development. The contacts identified the following community needs within the Omaha MSA AA:

- Small business micro-lending programs
- Affordable housing
- Capital injections into new home construction and home improvement projects

Additionally, bank management performed an assessment to identify needs within the AA. Through its assessment, management identified healthcare services as a primary need and confirmed affordable housing as a primary need within the Omaha MSA AA.

The following table provides information on the demographic composition of the bank’s full-scope AA(s).

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Omaha MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	156	17.3	24.4	33.3	25.0	0.0
Population by Geography	537,655	13.6	24.4	34.8	27.2	0.0
Housing Units by Geography	225,046	13.9	24.9	36.8	24.4	0.0
Owner-Occupied Units by Geography	128,781	7.6	21.8	37.0	33.5	0.0
Occupied Rental Units by Geography	79,760	20.9	29.6	37.7	11.8	0.0
Vacant Units by Geography	16,505	29.1	26.4	30.8	13.7	0.0
Businesses by Geography	47,923	7.8	17.6	41.3	33.3	0.0
Farms by Geography	1,442	5.1	14.7	43.2	37.0	0.0
Family Distribution by Income Level	129,038	23.0	17.8	19.7	39.5	0.0
Household Distribution by Income Level	208,541	26.1	16.6	17.8	39.5	0.0
Median Family Income MSA - 36540 Omaha-Council Bluffs, NE-IA MSA		\$73,632	Median Housing Value			\$151,602
			Median Gross Rent			\$824
			Families Below Poverty Level			10.5%
<i>Source: 2015 ACS and 2021 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

One method used to assess housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant’s income or a maximum monthly mortgage payment of \$920 for low-income borrowers and \$1,473 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner’s insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$1,604. Based on the information in the table above and the analysis of that information, LMI families would be challenged to afford a mortgage in the AA.

According to the September 2022 Moody’s Analytics report, the AA strengths are low costs, skilled workforce, and population growth, high-wage management jobs, above-average labor force participation, high housing affordability, and below-average employment volatility. The AA's growth is lagging in the near term and will match the region in the long-term. The 2022 unemployment rate for the AA was 2.4 percent compared to 4.7 percent in 2020. The leading industries by wage tier include management of companies and enterprises, federal government, offices of physicians, and computer systems design and related services. Major employers include Offutt Air Force Base, Nebraska Medicine, CHI, Methodist Health System, and Mutual of Omaha.

**Scope of Evaluation in Nebraska**

A full-scope review of the Omaha MSA was performed as the only AA in the state. Bank delineated AAs located in the same MSA are combined, analyzed, and presented as one AA for purposes of this evaluation. Refer to Appendix A - Scope of Examination, for a list of all AAs under review.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEBRASKA**

**LENDING TEST**

The bank’s performance under the Lending Test in Nebraska is rated Low Satisfactory when taking into consideration the positive impact of CD lending.

**Conclusions for Areas Receiving Full-Scope Reviews**

Based on a full-scope review, the bank’s performance in the Omaha MSA is poor

**Lending Activity**

Lending levels reflect good responsiveness to AA credit needs considering the number and dollar amount of home mortgage and small business loans relative to the bank’s lending capacity based on deposits, competition, and market presence.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Omaha MSA	52	76	-	9	137	100	100

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans (000’s)*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Omaha MSA	23,741	18,132	-	12,261	54,134	100	100

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

The following factors support the bank’s good responsiveness to community credit needs:

- The bank, with deposit market share of 0.4 percent, is ranked 26 of 37 depository institutions in the AA.
- Competition for loans is significant in the AA. There are a total of 400 residential mortgage lenders and 121 small business lenders in the AA.
- The bank's market share (0.1 percent) and rank (104) for mortgage lending are below those for deposits in the AA. The ranking for mortgage lending is significantly above the rank for deposits when considered in relation to the number of competitors. The deposit rank is in the 71<sup>st</sup> percentile and the bank's mortgage lending rank is in the 26<sup>th</sup> percentile.
- The bank's market share (0.2 percent) and rank (25) for small business lending are below those for deposits. When considered in relation to the number of competitors, the bank's small business lending rank (21<sup>st</sup> percentile) is significantly above the deposit rank.

### **Distribution of Loans by Income Level of the Geography**

The bank exhibits a poor geographic distribution of loans in its AA.

#### ***Home Mortgage Loans***

Refer to table O of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of the bank's home mortgage lending was poor. The proportion of loans was well below the percentage of owner-occupied housing units in low-income geographies and the aggregate. The proportion of loans was well below the percentage of owner-occupied housing units in moderate-income geographies and the aggregate.

#### ***Small Loans to Businesses***

Refer to table Q of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of the bank's small loans to businesses was poor. The proportion of loans was significantly below the percentage of businesses in low-income geographies and the aggregate. The proportion of loans are below the percentage of businesses in moderate-income geographies and the aggregate.

#### ***Lending Gap Analysis***

Maps of the bank's lending, supervisory data, and other summary reports were reviewed. No unexplained conspicuous gaps in the bank's lending within the rating area were identified.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibits a poor distribution of loans among individuals of different income levels and businesses of different sizes.

***Home Mortgage Loans***

Refer to table P 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 the bank's home mortgage lending was very poor. The proportion of loans was significantly below the percentage of low-income families and the aggregate. The proportion of loans was significantly below the percentage of moderate-income families and the aggregate.

***Small Loans to Businesses***

Refer to table R 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 business was adequate, based upon consideration of performance context information discussed in the front section of the PE. UMB originated 34.2 percent of its small business loans without revenue information. The percentage of bank loans in 2020 and 2021 to businesses with revenues less than \$1 million was significantly below the percentage of businesses and the aggregate industry distribution of loans to those businesses. However, we gave positive consideration for the bank's responsiveness to the needs created by the COVID-19 pandemic by making a significant volume of PPP lending without revenue information.

**Community Development Lending**

The bank is a leader in making CD loans which had a positive impact in the overall Lending Test rating in the rating area.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank originated nine loans totaling \$12.3 million representing 128.7 percent of allocated tier one capital. The bank utilized CD lending opportunities to meet identified credit needs. The bank supported identified CD needs of essential infrastructure (two loans totaling \$66,000) and economic development (three loans totaling \$ 5.5 million).

Additionally, the bank made four loans benefiting the broader statewide area totaling \$13.8 million without a P/M/F to benefit the bank's AAs.

**Product Innovation and Flexibility**

The bank makes adequate use of innovative and/or flexible lending practices in order to serve AA credit needs. Refer to Overall CRA Rating - Product Innovation and Flexibility for more detail.

**INVESTMENT TEST**

The bank's performance under the Investment Test in Nebraska is rated Outstanding.

**Conclusions for Areas Receiving Full-Scope Reviews**

Based on full-scope reviews, the bank’s performance in the Omaha MSA is excellent.

The bank has an excellent level of qualified CD investments, grants, and donations, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits excellent responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives. The majority of investments support affordable housing.

**Number and Amount of Qualified Investments**

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Omaha MSA	3	293	28	3,742	31	100.0	4,035	100.0	0	0

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

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

Considering the number of competitors in the market the bank’s level of qualified CD investment relative to investment opportunities and capacity in the AA is excellent. The bank made 31 investments, grants, and donations totaling approximately \$4 million. This includes three prior period investments totaling \$293,000 and eight current period investments totaling \$3.7 million. Additionally, the bank made 20 grants and donations totaling \$49,000. The bank’s total investments represented 37.2 percent of allocated tier 1 capital. The bank’s CD investments were responsive to affordable housing needs. The bank’s grants and donations were responsive to healthcare services supporting LMI individuals.

Examples of investments made during the valuation period include:

- A total of \$2.8 million investment in a community fund making investments into 26 affordable housing projects supporting LMI families within the AA.
- A \$122,000 investment in school bonds supporting repairs and new building construction.
- A \$20,000 donation to a nonprofit organization that provides job training and placement to LMI people with disabilities.

**SERVICE TEST**

The bank’s performance under the Service Test in Nebraska is rated Low Satisfactory.

**Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank’s performance in the Omaha MSA AA is adequate.

## Retail Banking Services

Service delivery systems are reasonably accessible to significant portions of the AA, particularly LMI geographies and/or LMI individuals.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Omaha	100.0	2	100.0	0.0	0.0	50.0	50.0	13.6	24.4	34.8	27.2

### Omaha MSA

UMB has two branches in the Omaha MSA AA. One of the branches is in a middle-income geography and the second branch is in an upper-income geography. These are the only branches in the only AA within the state of Nebraska. The bank has 0.3 percent of total bank deposits in the AA. The branch distribution in the AA is adequate when taking into consideration the bank's limited presence in the AA and the state of Nebraska.

The bank complements its traditional service delivery systems with alternative delivery systems, including debit cards, telephone and online banking, electronic bill pays, and mobile banking options. These systems provide additional delivery availability and access to banking services to both retail and business customers. The OCC does not place significant weight on these services, as no data was available to determine their impact on LMI individuals.

The bank did not open or close and branches during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. Services offered and branch hours are comparable among locations regardless of the income level of the area.

## Community Development Services

The bank provides an adequate level of CD services. CD services in the AA includes three employees participating in 10 activities, performing 103 hours of CD service activities at five different organizations.

Bank employees conducted presentations, taught courses, and provided technical assistance on finance and banking to community groups and LMI individuals. Bank employees served for a total of 103 hours as directors, committee members, or officers to various CD organizations.

The following are examples of the CD services provided in the AA:

- An employee served 32 hours on the board of directors at an organization whose mission is to help LMI individuals by serving those who are living in or at risk for living in poverty.

- An employee served 20 hours as a board member of a nonprofit organization supporting economic development.

## State Rating

### State of Oklahoma

<b>CRA rating for the State of Oklahoma:</b>	Satisfactory
<b>The Lending Test is rated:</b>	High Satisfactory
<b>The Investment Test is rated:</b>	Outstanding
<b>The Service Test is rated:</b>	Needs to Improve

The major factors that support this rating include:

- Lending levels reflect good responsiveness to credit needs in its AA;
- The bank exhibits an excellent geographic distribution of loans in its AAs;
- The bank exhibits an adequate distribution of loans among individuals of different income levels and businesses of different sizes;
- The bank is a leader in originating CD loans and was responsive to community needs;
- The bank has an excellent level of CD investments and grants;
- Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the AAs; and
- The bank provides a few if any level of CD services.

### Description of Bank's Operations in Oklahoma

The bank has two AAs within the state. These are the Oklahoma City MSA AA and Tulsa MSA AA. The bank chose full counties in all AAs. The bank offers a full range of loan and deposit products and services in its AA through its branches within the rating area.

Refer to Appendix A: Scope of the Examination – List of Assessment Areas and Type of Examination for the counties used to form the AAs.

#### Oklahoma City MSA

Based on FDIC deposit market share data as of June 30, 2022, the bank had \$181.9 million in deposits representing a 0.5 percent deposit market share in the AA and is ranked 31st out of 59 financial banks doing business in the AA. The deposits account for 0.6 percent of the total bank deposits. The largest depository institutions include MidFirst, JP Morgan Chase, BOKF, and Bancfirst.

The bank originated and purchased 1.4 percent of total bank loans in the AA. Home mortgages represented 28.8 percent and loans to small businesses represented 71.2 percent of lending in the AA.



Examiners performed three community contacts during the evaluation period to identify community needs and opportunities. The contacts focus on economic development, business development, and workforce development. Community contacts identified the following community needs in the Oklahoma City MSA AA:

- Financial literacy
- Small business lending
- Credit opportunities for entrepreneurs
- Affordable housing

The following table provides information on the demographic composition of the bank’s full-scope AA.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Oklahoma City MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	241	11.6	35.3	29.0	20.7	3.3
Population by Geography	754,480	10.6	32.4	29.7	26.9	0.4
Housing Units by Geography	326,985	10.2	34.0	29.9	25.4	0.5
Owner-Occupied Units by Geography	171,014	6.1	25.8	32.5	35.4	0.1
Occupied Rental Units by Geography	120,376	14.5	43.1	27.2	14.2	0.9
Vacant Units by Geography	35,595	15.5	42.1	26.7	14.9	0.8
Businesses by Geography	112,241	6.6	25.6	29.4	34.3	4.1
Farms by Geography	2,556	6.1	23.9	28.9	39.4	1.7
Family Distribution by Income Level	181,431	24.7	17.9	19.1	38.3	0.0
Household Distribution by Income Level	291,390	26.1	17.7	17.5	38.7	0.0
Median Family Income MSA - 36420 Oklahoma City, OK MSA		\$64,058	Median Housing Value			\$135,429
			Median Gross Rent			\$794
			Families Below Poverty Level			13.8%

*Source: 2015 ACS and 2021 D&B Data  
Due to rounding, totals may not equal 100.0%  
(\* The NA category consists of geographies that have not been assigned an income classification.*

One method used to assess housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant’s income or a maximum monthly mortgage payment of \$801 for low-income borrowers and \$1,281 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner’s insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$1,392. Based on the information in the table above, LMI families would be challenged to afford a mortgage in the AA.

According to the September 2022 Moody’s Analytics report, the AA strengths are a diverse economy that features a set of nonenergy drivers to fall back on, low-cost structure, large and stabilizing presence of professional/business services, and high concentration of prime-age workers. The AA’s growth is slow in the near term and will keep pace with the region and nation in the long-term. The 2022

unemployment rate for the AA was 2.8 percent compared to 6.3 percent in 2020. The leading industries by wage tier include federal government, total military personnel, offices of physicians, and management of companies and enterprises. Major employers include Tinker Air Force Base, University of Oklahoma - Norman, Integris Health, University of Oklahoma Health Sciences Center, and FAA Mike Monroney Aeronautical Center.

### Scope of Evaluation in Oklahoma

The Oklahoma City MSA received a full-scope review. The AA accounts for 67.2 percent of loans, 66.7 percent of branches, and 75.2 percent of deposits in the state throughout the evaluation period. The Tulsa MSA received a limited-scope review. Bank delineated AAs located in the same MSA are combined, analyzed, and presented as one AA for purposes of this evaluation. Refer to Appendix A - Scope of Examination, for a list of all AAs under review. More weight was given to the small loans to businesses conclusion than to the home mortgage conclusions in both AAs.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OKLAHOMA

### LENDING TEST

The bank’s performance under the Lending Test in Oklahoma is rated High Satisfactory.

### Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the Oklahoma City MSA is good.

### Lending Activity

Lending levels reflect good responsiveness to AA credit needs considering the number and dollar amount of home mortgage and small business loans relative to the bank’s lending capacity based on deposits, competition, and market presence.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Oklahoma City MSA	63	156	0	10	229	66.8	75.2
Tulsa MSA	38	69	0	7	114	33.2	24.8

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans (000s)*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Oklahoma City MSA	18,244	22,470	0	14,158	54,872	56.6	75.2
Tulsa MSA	6,293	16,916	0	18,915	42,124	43.4	24.8

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Oklahoma City MSA

The following factors support the bank's good responsiveness to community credit needs:

- The bank, with deposit market share of 0.4 percent, is ranked 35 of 58 depository institutions in the AA.
- Competition for loans is significant in the AA. There are a total of 510 residential mortgage lenders and 142 small business lenders in the AA.
- The bank's market share (0.1 percent) and rank (145) for mortgage lending are well below those for deposits in the AA. The ranking for mortgage lending is significantly above the rank for deposits when considered in relation to the number of competitors. The deposit rank is in the 61<sup>st</sup> percentile and the bank's mortgage lending rank is in the 29<sup>th</sup> percentile.
- The bank's market share (0.3 percent) and rank (35) for small business lending are near to those for deposits. When considered in relation to the number of competitors, the bank's small business lending rank (25<sup>th</sup> percentile) is significantly above the deposit rank.

**Distribution of Loans by Income Level of the Geography**

The bank exhibits an excellent geographic distribution of loans in its AAs.

***Home Mortgage Loans***

Refer to table O of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Oklahoma City

The geographic distribution of the bank's home mortgage lending was adequate. The proportion of loans was below the percentage of owner-occupied housing units in low-income geographies and near to the aggregate. The proportion of loans was well below the percentage of owner-occupied housing units in moderate-income geographies and the aggregate.

***Small Loans to Businesses***

Refer to table Q of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Oklahoma City MSA

The geographic distribution of the bank's small loans to businesses was excellent. The proportion of loans exceeded the percentages of businesses in low-income geographies and the aggregate. The proportion of loans exceeded the percentages of businesses in moderate-income geographies and the aggregate.

***Lending Gap Analysis***

Maps of the bank's lending, supervisory data, and other summary reports were reviewed. No unexplained conspicuous gaps in the bank's lending within the rating area were identified.

## **Distribution of Loans by Income Level of the Borrower**

The bank exhibits an adequate distribution of loans among individuals of different income levels and business and farms of different sizes.

### ***Home Mortgage Loans***

Refer to table P of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

#### Oklahoma City MSA

The borrower distribution of the bank's home mortgage lending was poor. The proportion of loans was below the percentage of low-income families and below the aggregate. The proportion of loans was below the percentage of moderate-income families and below the aggregate.

### ***Small Loans to Businesses***

Refer to table R 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.

#### Oklahoma City MSA

The borrower distribution of small loans to business was adequate, based upon consideration of performance context information discussed in the front section of the PE. UMB did not collect revenue information on 32.1 percent of the small loans to businesses originated during the evaluation period. The percentage of bank loans in 2020 and 2021 to businesses with revenues less than \$1 million was significantly below the percentage of businesses and the aggregate industry distribution of loans to those businesses. However, we gave positive consideration for the bank's responsiveness to the needs created by the COVID-19 pandemic by making a significant volume of PPP lending without revenue information.

## **Community Development Lending**

The bank is a leader in making CD loans which had a positive impact in the overall Lending Test rating in the state of Oklahoma rating area.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

#### Oklahoma City MSA

The bank originated 10 loans totaling \$14.2 million representing 92.1 percent of allocated tier one capital. The bank utilized CD lending opportunities to meet identified credit needs. The bank supported an identified CD need of economic development (one loan totaling \$ 1.3 million).

Additionally, the bank made one loan benefiting the broader statewide area totaling \$2.7 million without a P/M/F to benefit the bank's AAs.

## Product Innovation and Flexibility

The bank makes adequate use of innovative and/or flexible lending practices in order to serve AA credit needs. Refer to Overall CRA Rating - Product Innovation and Flexibility for more detail.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Lending Test in the Tulsa MSA is consistent with the bank's overall performance under the Lending Test in the full-scope area.

Refer to tables O through T of Appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

The bank's performance under the Investment Test in Oklahoma is rated Outstanding.

## Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Oklahoma City MSA is excellent.

The bank has an excellent level of qualified CD investments, grants, and donations, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits excellent responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives. The majority of investments support community services to LMI individuals.

## Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Oklahoma City MSA	2	343	27	18,714	29	69.0	19,057	87.2	0	0
Tulsa MSA	1	68	12	2,727	13	31.0	2,795	12.8	0	0

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

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

### Oklahoma City MSA

Considering the number of competitors in the market the bank's level of qualified CD investment relative to investment opportunities and capacity in the AA is excellent. The bank made 29 investments, grants, and donations totaling approximately \$19.1 million. This includes two prior period investments totaling \$343,000 and 14 current period investments totaling \$18.6 million. Additionally, the bank made 13 grants and donations totaling \$72,000. The bank's total investments represented 104.4 percent of allocated tier 1 capital. The bank's CD investments were responsive to needs, including investments to support capital improvements and purchase of equipment by local school districts. In addition, the bank

provided grants and donations supporting affordable housing needs, including LIHTC investments, and economic development via local CDFIs focused on job creation.

Examples of investments made during the valuation period include:

- A \$10 million investment in school bonds for a local school district to provide capital improvements and equipment where the majority of students come from LMI families.
- A \$2.2 million investment in an SBA loan fund that is a CDFI with the primary purpose of promoting job creation and retention for LMI individuals.
- A \$15,000 grant supporting the health, safety, education, and economic improvement of LMI families in Oklahoma City.

### Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s performance under the Investment Test in Tulsa MSA is consistent with the bank’s overall performance under the Investment Test in the full-scope area.

### SERVICE TEST

The bank’s performance under the Service Test in Oklahoma is rated Needs to Improve.

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Oklahoma City MSA AA is poor.

### Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank’s AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Oklahoma City	75.2	2	66.7	0.0	0.0	0.0	100.0	10.6	32.4	29.7	26.9
Tulsa	24.8	1	33.3	0.0	0.0	0.0	100.0	8.0	26.8	31.2	33.9

### Oklahoma City MSA

The bank has a limited presence in the Oklahoma City MSA AA. UMB has two branches in the Oklahoma City MSA AA with 0.5 percent of total bank deposits in the AA. Both branches are in upper-income geographies. The bank does not have any branches in low- or moderate-income geographies. One branch in an upper-income geography is within proximity to serve a moderate-income area. Bank management provided analysis and data showing bank deposit customers being served in the moderate-income geography. This branch enhancing accessibility to bank products

and services for residents in LMI geographies contributed positively to conclusions. The branch distribution in the AA is adequate when taking into consideration the two branches in the AA, the upper-income branch enhancing accessibility to bank products and services for residents in LMI geographies, and the very small volume of deposits held by the bank in the AA.

The bank complements its traditional service delivery systems with alternative delivery systems including debit cards, telephone and online banking, electronic bill pays, and mobile banking options. These systems provide additional delivery availability and access to banking services in both retail and business customers. The OCC does not place significant weight on these services, as no data was available to determine their impact on LMI individuals.

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, are tailored to the convenience and needs of its AA(s), particularly LMI geographies and/or individuals.

### **Community Development Services**

The bank provides few if any CD services. The level of CD services is inconsistent with UMB's capacity and expertise to conduct specific activities. The bank's CD service activities in the Oklahoma City MSA AA consisted of an employee contributing four hours to an organization that provides financial literacy education to LMI individuals.

### **Conclusions for Area Receiving a Limited-Scope Review**

Based on a limited-scope review, the bank's performance under the Service Test in the Tulsa MSA AA is consistent with the bank's overall performance under the Service Test in the full-scope area.

## State Rating

### State of Texas

<b>CRA rating for the State of Texas:</b>	Satisfactory
<b>The Lending Test is rated:</b>	High Satisfactory
<b>The Investment Test is rated:</b>	Outstanding
<b>The Service Test is rated:</b>	Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs in its AA;
- The bank exhibits a good geographic distribution of loans in its AA;
- The bank exhibits a poor distribution of loans among individuals of different income levels and businesses of different sizes;
- The bank is a leader in originating CD loans and was responsive to community needs which had a positive impact on the Lending Test conclusion;
- The bank has an excellent level of CD investments and grants;
- Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the AAs; and
- The bank provides an adequate level of CD services.

### Description of Bank's Operations in Texas

The bank has one AA within the state, the Dallas MSA. The bank chose full counties in the Dallas AA. The bank offers a full range of loan and deposit products and services in its AA through its branches within the rating area.

Refer to Appendix A: Scope of the Examination – List of Assessment Areas and Type of Examination for the counties used to form the AA.

Based on FDIC deposit market share data as of June 30, 2022, the bank had \$601 million in deposits representing a 0.1 percent deposit market share in the AA and is ranked 50th out of 157 financial banks doing business in the AA. The deposits account for 1.9 percent of the total bank deposits. The largest depository institutions include Charles Schwab, Bank of America, and JP Morgan Chase.

The bank originated and purchased 4.1 percent of total bank loans in the AA. Home mortgages represented 28.5 percent and loans to small businesses represented 71.5 percent of lending in the AA.



Examiners performed three community contacts during the evaluation period to identify needs within the Dallas MSA AA. The organizations contacted during the evaluation focus on homeownership, small business development, and economic development. Community contacts identified the following credit and CD needs in the AA:

- Financial literacy
- Start-up loans
- Expanding business lines of credit
- Establishing relationships with community development organizations

The following table provides information on the demographic composition of the bank’s full-scope AA(s).

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Dallas MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	1,175	13.8	26.4	25.7	33.5	0.6
Population by Geography	5,993,595	11.7	26.1	27.3	34.8	0.1
Housing Units by Geography	2,291,892	12.2	24.8	27.9	35.0	0.2
Owner-Occupied Units by Geography	1,230,948	5.5	20.2	28.7	45.5	0.1
Occupied Rental Units by Geography	887,170	19.5	30.4	27.4	22.3	0.4
Vacant Units by Geography	173,774	21.5	28.6	24.4	25.2	0.3
Businesses by Geography	723,092	7.1	18.3	25.6	48.3	0.7
Farms by Geography	11,860	5.0	16.8	28.6	49.2	0.5
Family Distribution by Income Level	1,452,003	23.8	16.4	17.9	42.0	0.0
Household Distribution by Income Level	2,118,118	24.0	16.5	17.7	41.8	0.0
Median Family Income MSA – 19124 Dallas-Plano-Irving, TX		\$71,149	Median Housing Value			\$180,162
Median Family Income MSA – 23104 Fort Worth-Arlington-Grapevine, TX		\$69,339	Median Gross Rent			\$982
			Families Below Poverty Level			11.7%

*Source: 2015 ACS and 2021 D&B Data  
Due to rounding, totals may not equal 100.0%  
(\* ) The NA category consists of geographies that have not been assigned an income classification.*

A method used to assess affordability of housing assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant’s income or a maximum monthly mortgage payment of \$889 for low-income borrowers and \$1,423 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner’s insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$1,823. Based on the information in the table above and the analysis performed using the information, LMI families would be challenged to afford a mortgage in the Dallas MSA AA.

According to the September 2022 Moody’s Analytics report, the AA strengths are stable demand for professional services because of many corporate headquarters, it is a well-positioned distribution center for Southwest as international trade grows, and favorable migration trends. The AA’s growth is outpacing the nation in the near term and will outpace the region and nation in the long-term. The 2022 unemployment rate for the AA was 3.5 percent compared to 7.1 percent in 2020. The leading industries by wage tier include computer systems design and related services, management of companies and enterprises, management, scientific and technical consulting services, and offices of physicians. Major employers include Walmart Inc., American Airlines, Baylor Scott & White Health, Lockheed Martin, and Southwestern Medical Center.

**Scope of Evaluation in Texas**

A full-scope review of the Dallas MSA was performed as it was the only AA in the state. Bank delineated AAs located in the same MSA are combined, analyzed, and presented as one AA for purposes of this evaluation. Refer to Appendix A – Scope of Examination, for a list of all AAs under review. More weight was given to the small loans to businesses conclusion than to the home mortgage conclusions.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TEXAS**

**LENDING TEST**

The bank’s performance under the Lending Test in Texas is rated High Satisfactory when taking into consideration the positive impact of CD lending.

**Conclusions for Areas Receiving Full-Scope Reviews**

Based on full-scope reviews, the bank’s performance in the Dallas MSA is good.

**Lending Activity**

Lending levels reflect excellent responsiveness to AA credit needs considering the number and dollar amount of home mortgage and small business loans relative to the bank’s lending capacity based on deposits, competition, and market presence.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Dallas MSA	185	464	-	34	683	100	100

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans (000s)*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Dallas MSA	114,637	99,036	-	142,902	356,575	100	100

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

The following factors support the bank’s excellent responsiveness to community credit needs:

- The bank, with deposit market share of 0.1 percent, is ranked 61 of 156 depository institutions in the Dallas MSA AA.
- Competition for loans is significant in the AA. There are 1,149 residential mortgage lenders and 344 small business lenders in the AA.
- The bank's market share (0.1 percent) for mortgage lending is equal to the deposit market share, but the rank (281) is significantly below the rank for deposits in the AA. The rank for mortgage lending is significantly above the rank for deposits when considered in relation to the number of competitors. The deposit rank is in the 40<sup>th</sup> percentile and the bank's mortgage lending rank is in the 25<sup>th</sup> percentile.
- The bank's market share (0.1 percent) for small business lending is equal to the market share for deposits, but the rank (74) for small business lending is below the rank for deposits. When considered in relation to the number of competitors, the bank's small business lending rank (22<sup>nd</sup> percentile) is significantly above the deposit rank.

### **Distribution of Loans by Income Level of the Geography**

The bank exhibits a good geographic distribution of loans in its AA.

#### ***Home Mortgage Loans***

Refer to table O of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of the bank's home mortgage lending was adequate. The proportion of loans was below the percentage of owner-occupied housing units in low-income geographies and exceeded the aggregate. The proportion of loans was significantly below the percentage of owner-occupied housing units in moderate-income geographies and below the aggregate.

#### ***Small Loans to Businesses***

Refer to table Q of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of the bank's small loans to businesses was good. The proportion of loans was somewhat near to the percentage of businesses in low-income geographies and to the aggregate. The proportion of loans was near to the percentage of businesses in moderate-income geographies and somewhat near to the aggregate.

#### ***Lending Gap Analysis***

Maps of the bank's lending, supervisory data, and other summary reports were reviewed. No unexplained conspicuous gaps in the bank's lending within the rating area were identified.

## **Distribution of Loans by Income Level of the Borrower**

The bank exhibits a poor distribution of loans among individuals of different income levels and business and farms of different sizes.

### ***Home Mortgage Loans***

Refer to table P 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 the bank's home mortgage lending was poor. The proportion of loans was well below the percentage of low-income families and exceeds the aggregate. The proportion of loans was well below the percentage of moderate-income families and significantly below the aggregate.

### ***Small Loans to Businesses***

Refer to table R 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 business was adequate, based upon consideration of performance context information discussed in the front section of the PE. The percentage of bank loans in 2020 and 2021 to businesses with revenues less than \$1 million was significantly below the percentage of businesses and the aggregate industry distribution of loans to those businesses. However, we gave positive consideration for the bank's responsiveness to the needs created by the COVID-19 pandemic by making a significant volume of PPP lending without revenue information.

## **Community Development Lending**

The bank is a leader in making CD loans which had a positive impact in the overall Lending Test rating in the rating area.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank originated 34 loans totaling \$142.9 million representing 276 percent of allocated tier one capital. The bank utilized CD lending opportunities to meet identified credit needs. The bank supported identified CD needs of community support services (seven loans totaling \$55 million) and affordable housing (one loan totaling \$44.7 million). Additionally, the bank made five loans benefiting the broader statewide area totaling \$24.3 million without a P/M/F to benefit the bank's AA.

## **Product Innovation and Flexibility**

The bank makes adequate use of innovative and/or flexible lending practices in order to serve AA credit needs. Refer to Overall CRA Rating – Product Innovation and Flexibility for more detail.

## **INVESTMENT TEST**

The bank’s performance under the Investment Test in Texas is rated Outstanding.

**Conclusions for Areas Receiving Full-Scope Reviews**

Based on full-scope reviews, the bank’s performance in the Dallas MSA is excellent.

The bank has an excellent level of qualified CD investments, grants, and donations, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits excellent responsiveness to credit and community economic development needs. The bank rarely uses innovative and/or complex investments to support CD initiatives. The majority of investments support community services to LMI individuals.

**Number and Amount of Qualified Investments**

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000’s)	#	\$(000’s)	#	% of Total #	\$(000’s)	% of Total \$	#	\$(000’s)
Dallas MSA	5	3,366	37	29,503	42	100.0	32,869	100.0	0	0

\* Prior Period Investments’ means investments made in a previous evaluation period that are outstanding as of the examination date.

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

Dallas MSA

Considering the number of competitors in the Dallas MSA AA, the bank’s level of qualified CD investment relative to investment opportunities and capacity in the AA is excellent. The bank made 42 investments, grants, and donations totaling approximately \$32.9 million. This includes five prior period investments totaling \$3.4 million and 12 current period investments totaling \$29.1 million. Additionally, the bank made 25 grants and donations totaling \$417,000. The bank’s total investments represented 54.5 percent of allocated tier 1 capital. The bank’s CD investments were responsive to community service needs, including the need for capital improvements for schools in local school districts with a majority of students from LMI families.

Examples of investments made during the evaluation period include:

- A \$10 million investment in school bonds for a school district where a majority of students participate in free or reduced-cost lunch programs. The financing supported construction, improvements, renovation, and equipping school buildings in the district.
- An MBS investment of \$534,000 in support of affordable housing.
- A \$230,000 grant to a mental health services provider in the AA that provides services to a clientele consisting primarily of LMI patients.

**SERVICE TEST**

The bank’s performance under the Service Test in Texas is rated Low Satisfactory.

## Conclusions for Area Receiving a Full-Scope Review

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

### Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System													
Assessment Area	Deposits % of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Branches Location of Branches by Income of Geographies (%)					Population % of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	Upp
				Dallas MSA	100.0	5	100.0	0.0	20.0	40.0	20.0	20.0	11.7

The bank has no branches in low-income areas. The percentage of branches located in moderate-income areas is somewhat near the percentage of population residing in these geographies. Three branches in middle- and upper-income geographies provide accessibility to bank products and services to residents in low- and moderate-income areas. Bank management provided analysis and data showing bank deposit customers are being served in the LMI CTs. This contributed positively to conclusions. The branch distribution in the AA is adequate.

UMB complements its traditional service delivery systems with alternative delivery systems, including online banking, mobile banking, text banking, deposit-taking ATMs, and digital account opening. These services are available to retail and business customers throughout the bank's AAs. No significant weight was placed on these services, as no analysis and data were available to determine the impact of the alternative delivery systems on bank customers.

The bank did not open or close and branches during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. Services offered and branch hours are comparable among locations regardless of the income level of the area.

### Community Development Services

The bank provides an adequate level of CD services in the Dallas MSA AA. The adequate level of services is inconsistent with its capacity and expertise to conduct specific activities. Five bank employees either held board or committee positions, provided financial literacy training to LMI individuals, or provided technical assistance aligned with their job duties to qualifying organizations.

The bank employees conducted presentations, taught courses, and provided technical assistance on finance and banking to community groups and LMI individuals. Bank employees volunteered 272 hours

to 10 organizations focused on financial literacy, revitalization activities, small business development, and affordable housing.

Examples of qualified CD services in the AA include:

- An employee served 94 hours on the board of a community service organization that taught financial literacy to LMI individuals.
- An employee served 48 hours as a board member of an organization supporting economic development in the area.
- An employee served eight hours as a board member of nonprofit organization that provides learning facilities and educational programs. The majority of those served by the nonprofit organization are LMI individuals.

## Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

<b>Time Period Reviewed:</b>	January 1, 2020 through December 31, 2021 Home mortgage, small business, small farm, consumer loans	
	January 1, 2020 through December 31, 2022 Community development loans, qualified investments, community development services	
<b>Bank Products Reviewed:</b>	Home mortgage, small business, small farm Community development loans, qualified investments, community development services	
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>MMSA(s)</b>		
Kansas City CSA	Full-scope	<u>Kansas</u> - Atchison, Douglas, Johnson, and Wyandotte Counties <u>Missouri</u> - Buchanan, Cass, Clay, Jackson, Johnson, and Platte Counties
St Louis MSA	Full-scope	<u>Illinois</u> - Madison and St. Clair Counties <u>Missouri</u> - Jefferson, St. Charles, St. Louis, and St. Louis City Counties
Arizona		
Phoenix MSA	Full-scope	Maricopa County
Colorado		
Colorado Springs MSA	Full-scope	El Paso County
Denver MSA	Full-scope	Adams, Arapahoe, Denver, Douglas, and Jefferson Counties
Kansas		
Kansas Non-MSA	Full-scope	Bourbon, Dickinson, and Russell Counties
Lawrence MSA	Full-scope	Douglas County
Manhattan MSA	Limited-scope	Riley Counties
Salina MSA	Limited-scope	Saline County
Topeka MSA	Full-scope	Shawnee County
Wichita MSA	Limited-scope	Sedgwick County
Missouri		
Columbia MSA	Full-scope	Boone and Cooper Counties
Jefferson City MSA	Limited-scope	Cole County
Joplin MSA	Limited-scope	Jasper County
MO Non-MSA	Full-scope	Barry, Benton, Henry, Lawrence, and Linn Counties
Springfield MSA	Full-scope	Greene County
Nebraska		
Omaha MSA	Full-scope	Douglas County
Oklahoma		
Oklahoma City MSA	Full-scope	Oklahoma County
Tulsa MSA	Limited-scope	Tulsa County
Texas		
Dallas MSA	Full-scope	Collin, Dallas, Denton, and Tarrant Counties



## Appendix B: Summary of MMSA and State Ratings

RATINGS UMB Bank, National Association				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
UMB Bank	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
MMSA or State:				
Kansas City CSA	High Satisfactory	Outstanding	Outstanding	Outstanding
St. Louis MMSA	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Arizona	High Satisfactory	Outstanding	Needs to Improve	Satisfactory
Colorado	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Kansas	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Missouri	Outstanding	Outstanding	High Satisfactory	Outstanding
Nebraska	Low Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Oklahoma	High Satisfactory	Outstanding	Needs to Improve	Satisfactory
Texas	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory

(\*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

## Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

**Affiliate:** Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

**Census Tract (CT):** A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

**Combined Statistical Area (CSA):** A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

**Community Development (CD):** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

**Community Reinvestment Act (CRA):** the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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

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

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

**Full-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

**Household:** Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

**Limited-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

**Low-Income Individual:** Individual income that is less than 50 percent of the area median income.

**Low Income Geography:** A census tract with a median family income that is less than 50 percent.

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

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an

employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area (MSA):** 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.

**MMSA (state):** Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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

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

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

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

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

**Tier 1 Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased loans are treated the same as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> 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 O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - 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 aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were 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) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

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

**Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - 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. Because aggregate 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 T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.

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

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																			<b>2020-21</b>	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Kansas City CSA	2,171	554,676	75.6	124,198	5.7	2.6	3.0	17.2	10.0	14.4	39.2	28.8	37.7	37.7	58.5	44.8	0.2	0.1	0.2	
STL MMSA	700	261,366	24.4	157,704	5.7	0.7	1.8	17.6	6.9	12.6	38.0	21.0	38.7	38.7	71.4	46.8	0.1	0.0	0.1	
<b>Total</b>	<b>2,871</b>	<b>816,042</b>	<b>100.0</b>	<b>281,902</b>	<b>5.7</b>	<b>2.1</b>	<b>2.3</b>	<b>17.4</b>	<b>9.3</b>	<b>13.4</b>	<b>38.5</b>	<b>26.9</b>	<b>38.2</b>	<b>38.2</b>	<b>61.6</b>	<b>45.9</b>	<b>0.1</b>	<b>0.1</b>	<b>0.2</b>	

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2020-21</b>	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Kansas City CSA	2,171	554,676	75.6	124,198	21.1	5.6	7.3	17.2	12.7	17.6	20.4	13.0	20.1	41.3	56.0	34.7	0.0	12.8	20.2	
STL MMSA	700	261,366	24.4	157,704	21.7	6.6	8.0	16.9	10.4	16.8	19.6	12.7	19.2	41.8	66.3	32.8	0.0	4.0	23.3	
<b>Total</b>	<b>2,871</b>	<b>816,042</b>	<b>100.0</b>	<b>281,902</b>	<b>21.4</b>	<b>5.9</b>	<b>7.7</b>	<b>17.1</b>	<b>12.1</b>	<b>17.2</b>	<b>20.0</b>	<b>12.9</b>	<b>19.6</b>	<b>41.6</b>	<b>58.5</b>	<b>33.6</b>	<b>0.0</b>	<b>10.6</b>	<b>21.9</b>	

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																			<b>2020-21</b>	
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Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Kansas City CSA	3,584	518,245	69.7	50,195	7.2	7.6	6.8	18.1	18.2	17.9	34.4	34.2	32.7	38.4	37.2	40.5	1.8	2.8	2.1
STL MMSA	1,555	280,895	30.3	62,675	7.3	13.2	6.3	18.7	16.7	17.5	32.4	28.4	33.3	40.8	40.3	42.1	0.9	1.5	0.9
<b>Total</b>	<b>5,139</b>	<b>799,140</b>	<b>100.0</b>	<b>112,870</b>	<b>7.2</b>	<b>9.3</b>	<b>6.5</b>	<b>18.4</b>	<b>17.7</b>	<b>17.7</b>	<b>33.3</b>	<b>32.4</b>	<b>33.0</b>	<b>39.7</b>	<b>38.1</b>	<b>41.4</b>	<b>1.3</b>	<b>2.4</b>	<b>1.4</b>

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2020-21**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Kansas City CSA	3,584	518,245	69.7	50,195	85.2	35.7	47.6	4.9	29.5	9.9	34.8
STL MMSA	1,555	280,895	30.3	62,675	85.0	35.3	50.8	5.3	37.4	9.7	27.3
<b>Total</b>	<b>5,139</b>	<b>799,140</b>	<b>100.0</b>	<b>112,870</b>	<b>85.1</b>	<b>35.6</b>	<b>49.4</b>	<b>5.1</b>	<b>31.9</b>	<b>9.8</b>	<b>32.5</b>

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2020-21**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Kansas City CSA	51	8,852	100.0	1,269	4.8	0.0	0.6	14.6	0.0	2.2	42.5	72.5	61.0	37.7	27.5	36.2	0.3	0.0	0.0

STL MMSA	0	0	0.0	591	3.6	0.0	1.0	14.8	0.0	9.3	41.3	0.0	47.4	39.8	0.0	42.1	0.4	0.0	0.2
<b>Total</b>	<b>51</b>	<b>8,852</b>	<b>100.0</b>	<b>1,860</b>	<b>4.2</b>	<b>0.0</b>	<b>0.8</b>	<b>14.7</b>	<b>0.0</b>	<b>4.5</b>	<b>41.9</b>	<b>72.5</b>	<b>56.7</b>	<b>38.8</b>	<b>27.5</b>	<b>38.1</b>	<b>0.4</b>	<b>0.0</b>	<b>0.1</b>

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

**Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** **2020-21**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Kansas City C SA	51	8,852	100.0	1,269	96.1	64.7	60.4	2.2	27.5	1.7	7.8
STL MMSA	0.0	0.0	0.0	591	96.2	0.0	58.5	2.3	0.0	1.5	0.0
<b>Total</b>	<b>51</b>	<b>8,852</b>	<b>100.0</b>	<b>1,860</b>	<b>96.2</b>	<b>64.7</b>	<b>59.8</b>	<b>2.2</b>	<b>27.5</b>	<b>1.6</b>	<b>7.8</b>

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

**Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** **2020-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Phoenix MSA	534	297,790	100.0	383,319	4.6	0.2	3.6	18.8	7.9	14.4	34.7	18.9	34.9	41.9	72.5	46.6	0.0	0.6	0.5
<b>Total</b>	<b>534</b>	<b>297,790</b>	<b>100.0</b>	<b>383,319</b>	<b>4.6</b>	<b>0.2</b>	<b>3.6</b>	<b>18.8</b>	<b>7.9</b>	<b>14.4</b>	<b>34.7</b>	<b>18.9</b>	<b>34.9</b>	<b>41.9</b>	<b>72.5</b>	<b>46.6</b>	<b>0.0</b>	<b>0.6</b>	<b>0.5</b>

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2020-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Phoenix MSA	534	297,790	100.0	383,319	21.8	1.5	5.2	16.9	4.3	16.0	19.2	5.8	20.1	42.2	81.6	40.2	0.0	6.7	18.5
<b>Total</b>	<b>534</b>	<b>297,790</b>	<b>100.0</b>	<b>383,319</b>	<b>21.8</b>	<b>1.5</b>	<b>5.2</b>	<b>16.9</b>	<b>4.3</b>	<b>16.0</b>	<b>19.2</b>	<b>5.8</b>	<b>20.1</b>	<b>42.2</b>	<b>81.6</b>	<b>40.2</b>	<b>0.0</b>	<b>6.7</b>	<b>18.5</b>

Source: 2015 ACS ; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2020-21**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Phoenix MSA	1,255	214,214	100.0	133,594	7.0	8.4	6.6	15.2	17.7	16.2	29.5	27.9	27.7	47.8	44.7	48.9	0.5	1.3	0.7
<b>Total</b>	<b>1,255</b>	<b>214,214</b>	<b>100.0</b>	<b>133,594</b>	<b>7.0</b>	<b>8.4</b>	<b>6.6</b>	<b>15.2</b>	<b>17.7</b>	<b>16.2</b>	<b>29.5</b>	<b>27.9</b>	<b>27.7</b>	<b>47.8</b>	<b>44.7</b>	<b>48.9</b>	<b>0.5</b>	<b>1.3</b>	<b>0.7</b>

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** **2020-21**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Phoenix MSA	1,255	214,214	100.0	133,594	92.1	31.5	48.0	1.8	34.1	6.1	34.4
<b>Total</b>	<b>1,255</b>	<b>214,214</b>	<b>100.0</b>	<b>133,594</b>	<b>92.1</b>	<b>31.5</b>	<b>48.0</b>	<b>1.8</b>	<b>34.1</b>	<b>6.1</b>	<b>34.4</b>

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

**Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** **2020-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Colorado Springs MSA	178	51,715	13.8	71,262	3.3	2.2	2.3	20.7	12.4	17.3	42.2	23.0	43.6	33.8	62.4	36.8	0.0	0.0	0.0
Denver MSA	1,110	659,818	86.2	266,350	4.8	2.6	4.5	19.4	6.2	18.3	33.7	18.0	32.8	42.1	73.2	44.4	0.0	0.0	0.0
<b>Total</b>	<b>1,288</b>	<b>711,533</b>	<b>100.0</b>	<b>337,612</b>	<b>4.5</b>	<b>2.6</b>	<b>4.0</b>	<b>19.6</b>	<b>7.1</b>	<b>18.1</b>	<b>35.4</b>	<b>18.7</b>	<b>35.1</b>	<b>40.4</b>	<b>71.7</b>	<b>42.8</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2020-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Colorado Springs MSA	178	51,715	13.8	71,262	20.4	5.1	4.1	18.5	11.8	14.5	20.3	14.0	20.7	40.8	65.2	32.8	0.0	3.9	27.8
Denver MSA	1,110	659,818	86.2	266,350	21.6	1.5	7.8	17.5	4.0	18.7	20.4	9.1	22.2	40.5	81.2	33.5	0.0	4.2	17.7
<b>Total</b>	<b>1,288</b>	<b>711,533</b>	<b>100.0</b>	<b>337,612</b>	<b>21.4</b>	<b>2.0</b>	<b>7.1</b>	<b>17.7</b>	<b>5.0</b>	<b>17.8</b>	<b>20.4</b>	<b>9.8</b>	<b>21.9</b>	<b>40.6</b>	<b>79.0</b>	<b>33.3</b>	<b>0.0</b>	<b>4.2</b>	<b>19.9</b>

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2020-21**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Colorado Springs MSA	340	55,015	17.2	17,565	6.9	10.3	7.4	23.2	30.9	22.6	34.1	25.3	32.5	35.7	33.5	37.4	0.1	0.0	0.0
Denver MSA	1,638	283,510	82.8	99,142	7.0	10.7	7.9	19.5	23.1	19.2	31.3	26.2	30.3	41.9	39.4	42.3	0.3	0.5	0.3
<b>Total</b>	<b>1,978</b>	<b>338,525</b>	<b>100.0</b>	<b>116,707</b>	<b>7.0</b>	<b>10.7</b>	<b>7.8</b>	<b>20.1</b>	<b>24.5</b>	<b>19.7</b>	<b>31.7</b>	<b>26.0</b>	<b>30.7</b>	<b>40.8</b>	<b>38.4</b>	<b>41.6</b>	<b>0.3</b>	<b>0.5</b>	<b>0.3</b>

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** **2020-21**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Colorado Springs MSA	340	55,015	17.2	17,565	92.6	34.4	54.4	1.9	34.4	5.5	31.2
Denver MSA	1,638	283,510	82.8	99,142	92.4	29.0	47.5	2.4	43.5	5.2	27.5
<b>Total</b>	<b>1,978</b>	<b>338,525</b>	<b>100.0</b>	<b>116,707</b>	<b>92.4</b>	<b>29.9</b>	<b>48.6</b>	<b>2.3</b>	<b>41.9</b>	<b>5.2</b>	<b>28.2</b>

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

**Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** **2020-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
KS Non-MSA	57	4,201	25.0	971	0.0	0.0	0.0	11.7	5.3	11.2	76.7	80.7	76.0	11.6	14.0	12.8	0.0	0.0	0.0
Lawrence MSA	25	6,869	11.0	5,065	1.3	4.0	2.1	25.4	12.0	24.3	36.9	20.0	34.1	36.3	64.0	39.6	0.0	0.0	0.0
Manhattan MSA	13	2,930	5.7	2,795	0.0	0.0	0.0	3.5	0.0	2.8	48.4	23.1	46.8	47.5	76.9	49.6	0.7	0.0	0.9
Salina MSA	40	4,438	17.5	1,148	0.0	0.0	0.0	26.4	10.0	21.5	22.2	17.5	24.0	51.4	72.5	54.5	0.0	0.0	0.0
Topeka MSA	19	3,143	8.3	7,060	4.6	0.0	2.1	15.3	10.5	10.7	39.1	42.1	39.4	41.0	47.4	47.9	0.0	0.0	0.0
Wichita MSA	74	23,569	32.5	23,898	5.8	2.7	3.1	19.6	6.8	14.5	29.0	16.2	28.2	45.6	74.3	54.2	0.0	0.0	0.0
<b>Total</b>	<b>228</b>	<b>45,150</b>	<b>100.0</b>	<b>40,937</b>	<b>4.2</b>	<b>1.3</b>	<b>2.4</b>	<b>18.6</b>	<b>7.5</b>	<b>14.4</b>	<b>34.8</b>	<b>35.5</b>	<b>33.1</b>	<b>42.5</b>	<b>55.7</b>	<b>50.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.1</b>

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2020-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
KS Non-MSA	57	4,201	25.0	971	20.2	10.5	7.0	19.1	24.6	17.3	21.6	28.1	18.8	39.1	31.6	27.2	0.0	5.3	29.7
Lawrence MSA	25	6,869	11.0	5,065	19.1	8.0	7.1	19.6	12.0	18.9	20.6	12.0	21.6	40.7	56.0	37.7	0.0	12.0	14.8
Manhattan MSA	13	2,930	5.7	2,795	22.5	0.0	3.7	18.2	23.1	13.3	19.2	23.1	18.5	40.1	53.8	35.7	0.0	0.0	28.7
Salina MSA	40	4,438	17.5	1,148	18.9	7.5	5.7	16.8	7.5	16.1	21.8	22.5	19.5	42.6	60.0	30.5	0.0	2.5	28.2
Topeka MSA	19	3,143	8.3	7,060	20.8	15.8	8.8	17.2	15.8	20.3	21.8	10.5	21.6	40.3	52.6	29.2	0.0	5.3	20.1
Wichita MSA	74	23,569	32.5	23,898	21.7	0.0	6.9	17.7	8.1	16.8	20.9	4.1	19.5	39.8	79.7	29.9	0.0	8.1	26.8
<b>Total</b>	<b>228</b>	<b>45,150</b>	<b>100.0</b>	<b>40,937</b>	<b>21.0</b>	<b>6.1</b>	<b>7.0</b>	<b>17.8</b>	<b>14.0</b>	<b>17.4</b>	<b>21.0</b>	<b>15.8</b>	<b>20.1</b>	<b>40.1</b>	<b>57.9</b>	<b>31.1</b>	<b>0.0</b>	<b>6.1</b>	<b>24.4</b>

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%



**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2020-21**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
KS Non-MSA	166	7,138	30.5	592	0.0	0.0	0.0	14.3	9.0	7.8	70.6	85.5	75.3	15.1	5.4	16.9	0.0	0.0	0.0
Lawrence MSA	57	12,182	10.5	2,212	6.0	0.0	3.6	30.2	22.8	32.2	31.9	29.8	32.9	31.9	47.4	31.3	0.0	0.0	0.0
Manhattan MSA	23	1,141	4.2	799	0.0	0.0	0.0	16.0	34.8	15.3	44.1	39.1	49.9	38.8	21.7	34.3	1.1	4.3	0.5
Salina MSA	57	5,374	10.5	525	0.0	0.0	0.0	43.9	43.9	40.4	14.5	1.8	11.4	41.6	54.4	48.2	0.0	0.0	0.0
Topeka MSA	69	15,716	12.7	2,417	15.4	10.1	10.8	17.8	30.4	18.1	40.1	37.7	42.2	26.6	21.7	28.9	0.0	0.0	0.0
Wichita MSA	173	42,672	31.7	9,671	5.9	2.3	6.0	26.9	33.5	26.9	26.2	28.9	25.4	41.0	35.3	41.6	0.0	0.0	0.0
<b>Total</b>	<b>545</b>	<b>84,223</b>	<b>100.0</b>	<b>16,216</b>	<b>6.6</b>	<b>2.0</b>	<b>5.7</b>	<b>25.5</b>	<b>25.7</b>	<b>25.5</b>	<b>31.7</b>	<b>45.0</b>	<b>31.5</b>	<b>36.2</b>	<b>27.2</b>	<b>37.3</b>	<b>0.1</b>	<b>0.2</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2020-21**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
KS Non-MSA	166	7,138	30.5	592	77.8	44.6	50.7	5.1	10.8	17.1	44.6
Lawrence MSA	57	12,182	10.5	2,212	85.2	28.1	49.1	4.1	56.1	10.6	15.8
Manhattan MSA	23	1,141	4.2	799	80.7	34.8	42.8	5.0	26.1	14.3	39.1
Salina MSA	57	5,374	10.5	525	76.6	42.1	49.3	7.1	17.5	16.2	40.4
Topeka MSA	69	15,716	12.7	2,417	79.9	33.3	45.6	6.1	43.5	14.0	23.2
Wichita MSA	173	42,672	31.7	9,671	83.3	22.5	51.3	5.8	59.0	11.0	18.5
<b>Total</b>	<b>545</b>	<b>84,223</b>	<b>100.0</b>	<b>16,216</b>	<b>82.2</b>	<b>33.8</b>	<b>49.6</b>	<b>5.6</b>	<b>36.3</b>	<b>12.2</b>	<b>29.9</b>

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2020-21**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
KS Non-MSA	79	12,170	72.5	403	0.0	0.0	0.0	2.4	2.5	0.2	92.6	96.2	96.8	5.0	1.3	3.0	0.0	0.0	0.0
Lawrence MSA	0	0	0.0	55	0.6	0.0	0.0	20.3	0.0	3.6	53.2	0.0	69.1	25.9	0.0	27.3	0.0	0.0	0.0
Manhattan MSA	7	1,110	6.4	35	0.0	0.0	0.0	5.9	0.0	5.7	31.4	71.4	34.3	62.7	28.6	60.0	0.0	0.0	0.0
Salina MSA	19	3,462	17.4	61	0.0	0.0	0.0	18.7	0.0	8.2	7.1	0.0	4.9	74.2	100.0	86.9	0.0	0.0	0.0
Topeka MSA	0	0	0.0	34	4.8	0.0	0.0	8.9	0.0	2.9	27.6	0.0	5.9	58.7	0.0	91.2	0.0	0.0	0.0
Wichita MSA	4	1,400	3.7	164	4.0	0.0	3.7	14.7	0.0	3.7	21.4	25.0	15.2	59.9	75.0	77.4	0.0	0.0	0.0
<b>Total</b>	<b>109</b>	<b>18,142</b>	<b>100.0</b>	<b>752</b>	<b>2.5</b>	<b>0.0</b>	<b>0.8</b>	<b>12.4</b>	<b>1.8</b>	<b>2.3</b>	<b>36.3</b>	<b>75.2</b>	<b>62.5</b>	<b>48.8</b>	<b>22.9</b>	<b>34.4</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2020-21**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
KS Non-MSA	79	12,170	72.5	403	98.7	84.8	77.9	1.3	6.3	0.0	8.9
Lawrence MSA	0	0.0	0.0	55	97.5	0.0	45.5	2.0	0.0	0.6	0.0
Manhattan MSA	7	1,110	6.4	35	93.6	57.1	42.9	2.5	42.9	3.9	0.0
Salina MSA	19	3,462	17.4	61	97.5	100.0	36.1	1.5	0.0	1.0	0.0
Topeka MSA	0	0.0	0.0	34	98.1	0.0	44.1	1.9	0.0	0.0	0.0
Wichita MSA	4	1,400	3.7	164	97.3	100.0	57.9	1.8	0.0	1.0	0.0
<b>Total</b>	<b>109</b>	<b>18,142</b>	<b>100.0</b>	<b>752</b>	<b>97.4</b>	<b>86.2</b>	<b>64.6</b>	<b>1.8</b>	<b>7.3</b>	<b>0.9</b>	<b>6.4</b>

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** **2020-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Columbia MSA	88	34,326	26.0	10,107	1.5	2.3	1.5	8.4	5.7	9.2	60.0	47.7	59.2	29.8	43.2	29.7	0.4	1.1	0.5
Jefferson City MSA	14	2,710	4.1	3,379	0.9	0.0	1.5	6.5	7.1	6.3	49.5	50.0	47.6	43.1	42.9	44.7	0.0	0.0	0.0
Joplin MSA	24	4,458	7.1	5,803	0.0	0.0	0.0	13.4	4.2	15.1	67.6	79.2	63.6	19.0	16.7	21.2	0.0	0.0	0.0
MO Non-MSA	96	10,130	28.4	5,212	0.0	0.0	0.0	9.0	19.8	8.0	80.2	70.8	78.9	10.8	9.4	13.0	0.0	0.0	0.0
Springfield MSA	116	77,797	34.3	17,606	3.6	4.3	3.0	16.9	7.8	15.3	47.6	36.2	48.6	31.9	51.7	33.2	0.0	0.0	0.0
<b>Total</b>	<b>338</b>	<b>129,421</b>	<b>100.0</b>	<b>42,107</b>	<b>1.6</b>	<b>2.1</b>	<b>1.7</b>	<b>12.0</b>	<b>10.4</b>	<b>12.2</b>	<b>59.6</b>	<b>52.7</b>	<b>56.9</b>	<b>26.7</b>	<b>34.6</b>	<b>29.1</b>	<b>0.1</b>	<b>0.3</b>	<b>0.1</b>

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2020-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Columbia MSA	88	34,326	26.0	10,107	20.5	6.8	7.2	17.0	15.9	17.2	21.6	11.4	17.8	40.9	48.9	32.3	0.0	17.0	25.5
Jefferson City MSA	14	2,710	4.1	3,379	17.1	21.4	8.8	16.2	14.3	19.2	24.0	21.4	19.9	42.8	42.9	30.1	0.0	0.0	22.0
Joplin MSA	24	4,458	7.1	5,803	19.9	8.3	6.6	18.4	16.7	17.8	19.8	20.8	19.1	41.8	54.2	30.9	0.0	0.0	25.6
MO Non-MSA	96	10,130	28.4	5,212	19.4	6.3	5.4	19.7	14.6	15.5	21.5	20.8	19.9	39.4	57.3	35.6	0.0	1.0	23.7
Springfield MSA	116	77,797	34.3	17,606	21.4	3.4	5.7	18.2	14.7	16.3	20.3	13.8	18.0	40.0	50.9	31.1	0.0	17.2	28.9
<b>Total</b>	<b>338</b>	<b>129,421</b>	<b>100.0</b>	<b>42,107</b>	<b>20.2</b>	<b>6.2</b>	<b>6.4</b>	<b>18.1</b>	<b>15.1</b>	<b>16.8</b>	<b>21.1</b>	<b>16.0</b>	<b>18.5</b>	<b>40.7</b>	<b>52.1</b>	<b>31.9</b>	<b>0.0</b>	<b>10.7</b>	<b>26.4</b>

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2020-21**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Columbia MSA	85	9,095	21.2	4,831	8.8	5.9	9.0	11.9	12.9	9.5	46.4	69.4	48.9	26.6	10.6	28.8	6.3	1.2	3.8
Jefferson City MSA	29	9,235	7.2	2,333	15.0	13.8	8.8	14.0	10.3	12.7	28.3	27.6	35.1	42.6	48.3	43.5	0.0	0.0	0.0
Joplin MSA	25	4,749	6.2	2,090	0.0	0.0	0.0	21.8	12.0	21.7	66.1	76.0	65.8	12.1	12.0	12.5	0.0	0.0	0.0
MO Non-MSA	141	9,626	35.2	2,458	0.0	0.0	0.0	8.5	16.3	8.9	80.2	63.1	79.2	11.3	20.6	11.9	0.0	0.0	0.0
Springfield MSA	121	22,283	30.2	7,532	3.3	3.3	2.8	30.5	34.7	29.8	41.9	30.6	41.1	23.9	31.4	26.1	0.4	0.0	0.2
<b>Total</b>	<b>401</b>	<b>54,988</b>	<b>100.0</b>	<b>19,244</b>	<b>5.1</b>	<b>3.2</b>	<b>4.4</b>	<b>20.2</b>	<b>20.4</b>	<b>19.1</b>	<b>49.5</b>	<b>52.9</b>	<b>49.9</b>	<b>23.5</b>	<b>23.2</b>	<b>25.6</b>	<b>1.7</b>	<b>0.2</b>	<b>1.0</b>

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2020-21**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Columbia MSA	85	9,095	21.2	4,831	84.0	42.4	47.1	4.2	22.4	11.8	35.3
Jefferson City MSA	29	9,235	7.2	2,333	78.8	13.8	45.2	5.7	48.3	15.5	37.9
Joplin MSA	25	4,749	6.2	2,090	81.4	28.0	42.7	4.8	32.0	13.8	40.0
MO Non-MSA	141	9,626	35.2	2,458	84.2	41.1	57.2	3.7	12.1	12.1	46.8
Springfield MSA	121	22,283	30.2	7,532	84.1	35.5	44.1	5.3	36.4	10.6	28.1
<b>Total</b>	<b>401</b>	<b>54,988</b>	<b>100.0</b>	<b>19,244</b>	<b>83.2</b>	<b>36.9</b>	<b>46.5</b>	<b>4.8</b>	<b>25.4</b>	<b>12.0</b>	<b>37.7</b>

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%



**Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2020-21**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Columbia MSA	15	2,345	18.3	316	1.6	0.0	1.6	7.8	0.0	2.8	74.9	100.0	84.8	14.9	0.0	10.8	0.7	0.0	0.0
Jefferson City MSA	0	0	0.0	277	2.8	0.0	0.4	4.7	0.0	1.4	47.6	0.0	60.3	44.9	0.0	37.9	0.0	0.0	0.0
Joplin MSA	3	305	3.7	150	0.0	0.0	0.0	7.7	33.3	4.7	82.2	66.7	94.0	10.0	0.0	1.3	0.0	0.0	0.0
MO Non-MSA	64	9,454	78.0	1,014	0.0	0.0	0.0	3.8	12.5	6.9	82.8	43.8	81.1	13.4	43.8	12.0	0.0	0.0	0.0
Springfield MSA	0	0	0.0	250	2.9	0.0	0.4	15.5	0.0	3.2	52.3	0.0	78.4	29.3	0.0	18.0	0.0	0.0	0.0
<b>Total</b>	<b>82</b>	<b>12,104</b>	<b>100.0</b>	<b>2,007</b>	<b>1.5</b>	<b>0.0</b>	<b>0.3</b>	<b>8.6</b>	<b>11.0</b>	<b>4.9</b>	<b>68.6</b>	<b>54.9</b>	<b>79.4</b>	<b>21.0</b>	<b>34.1</b>	<b>15.3</b>	<b>0.2</b>	<b>0.0</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** **2020-21**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Columbia MSA	15	2,345	18.3	316	96.3	100.0	51.3	1.2	0.0	2.5	0.0
Jefferson City MSA	0	0.0	0.0	277	96.9	0.0	34.3	1.2	0.0	2.0	0.0
Joplin MSA	3	305	3.7	150	99.2	66.7	59.3	0.4	33.3	0.4	0.0
MO Non-MSA	64	9,454	78.0	1,014	98.3	82.8	73.9	0.8	6.3	0.8	10.9
Springfield MSA	0	0.0	0.0	250	97.2	0.0	56.4	1.1	0.0	1.7	0.0
<b>Total</b>	<b>82</b>	<b>12,104</b>	<b>100.0</b>	<b>2,007</b>	<b>97.4</b>	<b>85.4</b>	<b>61.6</b>	<b>1.0</b>	<b>6.1</b>	<b>1.6</b>	<b>8.5</b>

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** **2020-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Omaha MSA	52	23,741	100.0	33,511	7.6	0.0	4.8	21.8	1.9	17.1	37.0	13.5	35.0	33.5	84.6	43.1	0.0	0.0	0.0
<b>Total</b>	<b>52</b>	<b>23,741</b>	<b>100.0</b>	<b>33,511</b>	<b>7.6</b>	<b>0.0</b>	<b>4.8</b>	<b>21.8</b>	<b>1.9</b>	<b>17.1</b>	<b>37.0</b>	<b>13.5</b>	<b>35.0</b>	<b>33.5</b>	<b>84.6</b>	<b>43.1</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2020-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Omaha MSA	52	23,741	100.0	33,511	23.0	0.0	7.7	17.8	3.8	19.1	19.7	7.7	19.7	39.5	78.8	32.7	0.0	9.6	20.8
<b>Total</b>	<b>52</b>	<b>23,741</b>	<b>100.0</b>	<b>33,511</b>	<b>23.0</b>	<b>0.0</b>	<b>7.7</b>	<b>17.8</b>	<b>3.8</b>	<b>19.1</b>	<b>19.7</b>	<b>7.7</b>	<b>19.7</b>	<b>39.5</b>	<b>78.8</b>	<b>32.7</b>	<b>0.0</b>	<b>9.6</b>	<b>20.8</b>

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2020-21**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Omaha MSA	76	18,132	100.0	13,343	7.8	0.0	7.6	17.6	11.8	16.0	41.3	55.3	40.8	33.3	32.9	35.6	0.0	0.0	0.0
<b>Total</b>	<b>76</b>	<b>18,132</b>	<b>100.0</b>	<b>13,343</b>	<b>7.8</b>	<b>0.0</b>	<b>7.6</b>	<b>17.6</b>	<b>11.8</b>	<b>16.0</b>	<b>41.3</b>	<b>55.3</b>	<b>40.8</b>	<b>33.3</b>	<b>32.9</b>	<b>35.6</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** **2020-21**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Omaha MSA	76	18,132	100.0	13,343	84.4	25.0	54.2	5.7	40.8	9.9	34.2
<b>Total</b>	<b>76</b>	<b>18,132</b>	<b>100.0</b>	<b>13,343</b>	<b>84.4</b>	<b>25.0</b>	<b>54.2</b>	<b>5.7</b>	<b>40.8</b>	<b>9.9</b>	<b>34.2</b>

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

**Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** 2020-21

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Oklahoma City MSA	63	18,244	62.4	35,614	6.1	3.2	3.4	25.8	6.3	17.9	32.5	11.1	29.4	35.4	79.4	49.1	0.1	0.0	0.2
Tulsa MSA	38	6,293	37.6	28,586	4.5	2.6	1.3	20.5	0.0	12.7	32.9	42.1	33.7	42.1	55.3	52.3	0.0	0.0	0.0
<b>Total</b>	<b>101</b>	<b>24,538</b>	<b>100.0</b>	<b>64,200</b>	<b>5.4</b>	<b>3.0</b>	<b>2.5</b>	<b>23.4</b>	<b>4.0</b>	<b>15.6</b>	<b>32.7</b>	<b>22.8</b>	<b>31.3</b>	<b>38.5</b>	<b>70.3</b>	<b>50.5</b>	<b>0.1</b>	<b>0.0</b>	<b>0.1</b>

Source: 2015 ACS ; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** 2020-21

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Oklahoma City MSA	63	18,244	62.4	35,614	24.7	1.6	5.1	17.9	9.5	13.6	19.1	11.1	15.8	38.3	76.2	33.6	0.0	1.6	32.0
Tulsa MSA	38	6,293	37.6	28,586	22.0	7.9	5.6	16.9	23.7	15.6	19.6	13.2	17.5	41.4	55.3	34.9	0.0	0.0	26.5
<b>Total</b>	<b>101</b>	<b>24,538</b>	<b>100.0</b>	<b>64,200</b>	<b>23.4</b>	<b>4.0</b>	<b>5.3</b>	<b>17.4</b>	<b>14.9</b>	<b>14.5</b>	<b>19.4</b>	<b>11.9</b>	<b>16.5</b>	<b>39.8</b>	<b>68.3</b>	<b>34.2</b>	<b>0.0</b>	<b>1.0</b>	<b>29.5</b>

Source: 2015 ACS ; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2020-21**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Oklahoma City MSA	156	22,470	69.3	21,934	6.6	7.7	6.6	25.6	33.3	24.4	29.4	29.5	29.2	34.3	20.5	36.4	4.1	9.0	3.4
Tulsa MSA	69	15,916	30.7	16,005	4.1	2.9	3.7	21.1	31.9	21.5	33.9	23.2	34.2	40.9	42.0	40.7	0.0	0.0	0.0
<b>Total</b>	<b>225</b>	<b>38,386</b>	<b>100.0</b>	<b>37,939</b>	<b>5.4</b>	<b>6.2</b>	<b>5.4</b>	<b>23.6</b>	<b>32.9</b>	<b>23.1</b>	<b>31.4</b>	<b>27.6</b>	<b>31.3</b>	<b>37.3</b>	<b>27.1</b>	<b>38.2</b>	<b>2.3</b>	<b>6.2</b>	<b>1.9</b>

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** **2020-21**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Oklahoma City MSA	156	22,470	69.3	21,934	89.5	39.1	40.1	3.3	28.8	7.2	32.1
Tulsa MSA	69	15,916	30.7	16,005	88.9	27.5	41.4	3.9	42.0	7.2	30.4
<b>Total</b>	<b>225</b>	<b>38,386</b>	<b>100.0</b>	<b>37,939</b>	<b>89.3</b>	<b>35.6</b>	<b>40.7</b>	<b>3.6</b>	<b>32.9</b>	<b>7.2</b>	<b>31.6</b>

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** **2020-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Dallas MSA	185	114,637	100.0	325,396	5.5	4.3	3.0	20.2	9.2	12.1	28.7	16.2	29.1	45.5	70.3	55.7	0.1	0.0	0.2
<b>Total</b>	<b>185</b>	<b>114,637</b>	<b>100.0</b>	<b>325,396</b>	<b>5.5</b>	<b>4.3</b>	<b>3.0</b>	<b>20.2</b>	<b>9.2</b>	<b>12.1</b>	<b>28.7</b>	<b>16.2</b>	<b>29.1</b>	<b>45.5</b>	<b>70.3</b>	<b>55.7</b>	<b>0.1</b>	<b>0.0</b>	<b>0.2</b>

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2020-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Dallas MSA	185	114,637	100.0	325,396	23.8	3.8	3.3	16.4	3.8	12.5	17.9	6.5	18.1	42.0	71.4	44.3	0.0	14.6	21.7
<b>Total</b>	<b>185</b>	<b>114,637</b>	<b>100.0</b>	<b>325,396</b>	<b>23.8</b>	<b>3.8</b>	<b>3.3</b>	<b>16.4</b>	<b>3.8</b>	<b>12.5</b>	<b>17.9</b>	<b>6.5</b>	<b>18.1</b>	<b>42.0</b>	<b>71.4</b>	<b>44.3</b>	<b>0.0</b>	<b>14.6</b>	<b>21.7</b>

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2020-21**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Dallas MSA	464	99,036	100.0	213,406	7.1	6.3	7.4	18.3	18.1	19.3	25.6	23.7	24.5	48.3	50.4	48.2	0.7	1.5	0.7
<b>Total</b>	<b>464</b>	<b>99,036</b>	<b>100.0</b>	<b>213,406</b>	<b>7.1</b>	<b>6.3</b>	<b>7.4</b>	<b>18.3</b>	<b>18.1</b>	<b>19.3</b>	<b>25.6</b>	<b>23.7</b>	<b>24.5</b>	<b>48.3</b>	<b>50.4</b>	<b>48.2</b>	<b>0.7</b>	<b>1.5</b>	<b>0.7</b>

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** **2020-21**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Dallas MSA	464	99,036	100.0	213,406	88.4	34.3	43.0	3.6	35.1	8.0	30.6
<b>Total</b>	<b>464</b>	<b>99,036</b>	<b>100.0</b>	<b>213,406</b>	<b>88.4</b>	<b>34.3</b>	<b>43.0</b>	<b>3.6</b>	<b>35.1</b>	<b>8.0</b>	<b>30.6</b>

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%