



PUBLIC DISCLOSURE

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COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

UMB Bank, National Association
Charter Number 23920

1010 Grand Blvd.
Kansas City, MO 64106

Office of the Comptroller of the Currency

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

Table of Contents

OVERALL CRA RATING	2
DEFINITIONS AND COMMON ABBREVIATIONS	4
DESCRIPTION OF INSTITUTION	8
SCOPE OF THE EVALUATION.....	9
DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW	12
MULTISTATE METROPOLITAN AREA RATING	13
KANSAS CITY MMSA	13
MULTISTATE METROPOLITAN AREA RATING	23
ST. LOUIS MMSA.....	23
STATE RATING.....	31
STATE OF ARIZONA	31
STATE RATING.....	39
STATE OF COLORADO	39
STATE RATING.....	48
STATE OF KANSAS	48
STATE RATING.....	64
STATE OF MISSOURI	64
STATE RATING.....	81
STATE OF NEBRASKA.....	81
STATE RATING.....	89
STATE OF OKLAHOMA	89
STATE RATING.....	97
STATE OF TEXAS.....	97
APPENDIX A: SCOPE OF EXAMINATION.....	104
APPENDIX B: SUMMARY OF MULTISTATE METROPOLITAN AREA AND STATE RATINGS.....	B-1
APPENDIX C: COMMUNITY PROFILES FOR FULL-SCOPE AREAS.....	C-1
APPENDIX D: TABLES OF PERFORMANCE DATA	D-1

Overall CRA Rating

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority when examining financial institutions subject to its supervision, to assess the institution’s record of meeting the credit needs of its entire community, including low- and moderate-income (LMI) neighborhoods, consistent with the safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution’s record of meeting the credit needs of the community.

This document is an evaluation of the CRA performance of UMB Bank, N.A. (UMB or bank) issued by the Office of the Comptroller of the Currency (OCC), the institution’s supervisory agency, for the evaluation period starting January 1, 2012 through December 31, 2016. The agency rates the CRA performance of an institution consistently with the provisions set forth in Appendix A, to 12 CFR Part 25.

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

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

Performance Levels	(Name of Depository Institution) 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 bank originated a majority of loans inside of its assessment areas (AA);
- The bank’s lending activity is excellent. The bank had excellent lending activity in the Kansas City MMSA;
- The bank’s geographic distribution of loans is good. The geographic distribution of small loans to businesses is excellent in the Kansas City MMSA;
- CD loans had a neutral impact on the overall lending test rating;
- Overall the distribution of loans by income level of borrowers is adequate;

- The bank's overall level of qualified CD investments is excellent;
- Overall, bank branches are accessible to essentially all portions of the bank's AAs;
- UMB employees provided a good level of CD services that were responsive to identified community needs.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

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

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

Community Development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also

include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn, loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

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

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

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

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

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

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

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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

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

Multifamily: Refers to a residential structure that contains five or more units.

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

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

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

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

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

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report).

These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

Tier One Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

Description of Institution

UMB Bank is a wholly-owned subsidiary of UMB Financial Corporation, a financial services holding company founded in 1913 and headquartered in Kansas City, Missouri. The bank provides a comprehensive suite of banking products and services through 108 branches in eight states, which are Missouri, Illinois, Colorado, Kansas, Oklahoma, Nebraska, Arizona, and Texas. In addition to the regional banking presence, UMB serves customers nationwide with services that include healthcare services, institutional banking, trust services, asset-based lending, and factoring.

UMB's assessment areas consist of the metropolitan areas of the multistate areas of Kansas City and St. Louis. The areas of Denver and Colorado Springs in Colorado, Phoenix in Arizona, Dallas and Fort Worth in Texas, Oklahoma City and Tulsa in Oklahoma, Omaha in Nebraska, Columbia, Jefferson City, Joplin, Springfield, and St. Joseph in Missouri, Lawrence, Manhattan, Topeka, and Wichita in Kansas as well as several non-metropolitan areas in the states of Kansas and Missouri.

UMB Capital Corporation is a subsidiary of UMB Financial Corporation and is a Small Business Investment Corporation (SBIC) as recognized by the Small Business Association. The SBIC was capitalized by UMB Bank for the amounts of \$10 million and \$15 million on March 23 2015 and February 25, 2016, respectively.

UMB Financial Corporation is aligned into three strategic segments: banking (UMB Bank), asset servicing (UMB Fund Services) and institutional investment management (Scout Investments).

As of December 31, 2016, UMB had total assets of \$20.4 billion with Tier One Capital of \$1.6 billion. The loan portfolio accounted for approximately 51.69 percent of total assets, which consisted of real estate loans of 49.05 percent; commercial loans of 42.10 percent; consumer loans of 3.60 percent; and agricultural and other loans of 5.25 percent.

On January 1, 2013, UMB Financial Corporation consolidated the charters for UMB National Bank of America, UMB Bank Colorado, and UMB Bank of Arizona, N.A. with Kansas City-based UMB Bank. In June 2015, UMB Financial Corporation acquired Marquette Financial Companies, a \$1.3 billion financial services company, which included 13 retail branches, an asset management firm and two specialist lending entities. The acquisition of Marquette Financial Companies further expanded the bank's presence in its Dallas, Fort Worth and Phoenix assessment areas.

UMB increased its focus on commercial real estate lending, growing the loan portfolio to \$3.2 billion in 2016 and expanding into key markets, including Dallas, Fort Worth, Phoenix, St. Louis, and Denver. Additionally, the bank continues to focus on commercial and industrial lending, increasing total loans from \$2.90 billion in 2012 to \$4.4 billion in 2016. The bank's focus and success in the healthcare space continues to grow. UMB healthcare services now ranks sixth in deposits and assets and fifth in number of accounts within the industry.

There are no known legal, financial or other factors impeding UMB Bank's ability to help meet the credit needs within its assessment areas. UMB Bank was rated "Satisfactory" in the last published CRA examination dated June 4, 2012.

Scope of the Evaluation

Evaluation Period/Products Evaluated

For the Lending Test, we analyzed home purchase, home improvement, and home refinance mortgage loans that the bank reported under the Home Mortgage Disclosure Act (HMDA), and small loans made to businesses and small loans to farms the bank reported under the CRA. Both loan types were reviewed for the period of January 1, 2012 through December 31, 2016. Multifamily loans are not a primary loan product; therefore, we did not evaluate this product separately. Primary loan products for this review are products in which the bank originated at least 20 loans within the AA during the evaluation period.

Due to merger and acquisition activity during the examination cycle, the following assessment areas have different evaluation period start dates for all CRA reportable activity:

- Denver MSA, Colorado Springs MSA, Manhattan MSA, and Phoenix MSA evaluation start date is January 1, 2013.
- Dallas MD evaluation start date is October 18, 2013.
- Fort Worth MD evaluation start date is July 1, 2014.

Home purchase loans were not a primary loan product in the Topeka MSA and Omaha MSA. Home improvement loans were a primary product in the Kansas City MMSA, Kansas non-MSA, and Joplin MSA. Small loans to farms were primary loan products in the Kansas city MMSA, Kansas non-MSA, Missouri non-MSA, and Joplin MSA.

We used deposit information for the bank, reported to the FDIC, as of June 30, 2016.

Data Integrity

As part of our ongoing supervision of the bank, we tested the accuracy of the bank's HMDA and CRA lending data. We also reviewed the appropriateness of CD activities provided for consideration in our evaluation. This included testing of CD loans, investments, and services for accuracy and to determine if they qualify as CD as defined in the CRA regulation. Our testing indicated no substantive inaccuracies in the data. Therefore, we concluded that the home mortgage loans, small loans to businesses and farms, and CD activity data could be relied upon for this evaluation.

Selection of Areas for Full-Scope Review

In each state and multistate metropolitan area where the bank has an office, a sample of AAs within that state/multistate metropolitan area was selected for full-scope reviews. Refer to the "Scope" section under each State and Multistate Metropolitan Area Rating section (as applicable) for details regarding how the areas were selected.

Ratings

The bank's overall rating is a blend of the multistate metropolitan area rating(s) and state ratings. The Kansas City MMSA carried the greatest weight in our conclusions because it represents the bank's most significant market in terms of deposit concentrations, branch distribution, and reportable loans. As of June 30, 2016, the Kansas City MMSA had 65.66 percent of UMB's total deposits. Additionally, 27.83 percent of the bank's branches are located within the AA, and over 33 percent of the reportable loan originations. The bank's headquarters is located in Kansas City, MO. When evaluating the bank's lending, we placed the most weight on small business lending. Small business lending accounted for over 60 percent of the total bank originations throughout the evaluation period. An emphasis on small business lending is consistent with the bank's strategic focus.

The multistate metropolitan area rating(s) and state ratings are based primarily on those areas that received full-scope reviews. Refer to the "Scope" section under each State and Multistate Metropolitan Area Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Inside/Outside Ratio

The ratio is a bank-wide calculation and not calculated by individual rating area or AA. Analysis is limited to bank originations and purchases and does not include any affiliate data. For the combined five-year evaluation period, UMB originated a majority of all loan products inside the bank's AAs (75.68 percent). The percentage of loans made inside the AAs, by loan type, are as follows: home purchase loans (83.15 percent), home improvement loans (88.76 percent), home refinance loans (84.27 percent), small loans to businesses (76.19 percent) and small loans to farms (58.15 percent).

Other Performance Data – Investment Test

In addition to qualified CD investments made within the bank's AAs and broader statewide areas, UMB made investments in the broader regional area that includes the bank's AAs. These investments were made to a SBIC with a purpose/mandate/function (PMF) to serve one or more of the bank's AAs, and were considered in the analysis of the bank's overall Investment Test performance. During the evaluation period, UMB made two investments totaling \$25 million with the SBIC, who then invested in small businesses located in Kansas, Missouri, Texas, and other states in the bank's broader regional area.

Other Performance Data – Service Test

Bank-wide, UMB offers a variety of consumer banking products that have the potential to benefit low- and moderate-income individuals. These products also have the potential to help the unbanked. Services available at all UMB locations include:

- Electronic banking allows customers to access deposit accounts to check balances, view transactions, transfer funds, view imaged checks, reorder checks, conduct transfers between accounts and complete a mortgage application 24 hours a day through UMB's internet site. There is no charge for online banking or bill pay.
- Mobile banking provides customers access to deposit accounts to monitor balances, view transactions, and locate ATMs and branches. UMB charges no fees for mobile banking

services.

- Digital Genius Service is provided by trained employees who teach customers how to access, track and control their finances through mobile banking and ATM functions. This service is available in all AAs.
- Government Check Cashing is available to all accountholders for Federal Social Security, Supplemental Security Income, and State checks. Non-accountholders may cash government checks up to \$1,000 for a fee. Some rural branches do not charge a fee.
- Telephone banking services and banking by mail are available to all branches.
- Electronic Transfer Account is a checkless, low-cost account for recipients of Federal payments. These accounts support the government's initiative to improve access to financial services and encourage low- and moderate-income individuals to establish accounts to receive their payments. Features include no minimum balance, a \$3 monthly service fee, an ATM card with unlimited UMB ATM withdrawals, a \$2 fee when customers do not use an UMB ATM for withdrawals.

Discriminatory or Other Illegal Credit Practices Review

First paragraph for all banks:

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

The OCC has not identified that this institution [or any affiliate whose loans have been considered as part of the institution's lending performance] has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC does not have public information regarding non-compliance with statutes and regulations prohibiting discriminatory or other illegal credit practices with respect to this institution. In determining this institution's overall CRA rating, the OCC has considered information that was made available to the OCC on a confidential basis during its consultations.

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 Area Rating

Kansas City MMSA

CRA rating for the Kansas City MMSA¹: Satisfactory

The lending test is rated:	High Satisfactory
The investment test is rated:	High Satisfactory
The service test is rated:	High Satisfactory

The major factors that support this rating include:

- Good lending activity based on good small business lending activity. UMB had the highest dollar volume of small businesses in the AA;
- Good overall geographic distribution of loans. Excellent geographic distribution of small loans to businesses mitigates adequate home mortgage lending;
- An adequate distribution of loans based on income level of the borrower or revenues of the business. Poor distribution of loans based on income level of the borrower or revenues of the business. Poor distribution of small loans to businesses was bolstered by excellent home mortgage performance;
- CD lending performance had a neutral impact on lending test performance;
- Overall good investment performance;
- Branch delivery systems and bank products are accessible to geographies and individuals of different income levels, and;
- An overall good level of CD services that were responsive to community needs.

Description of Institution's Operations in Kansas City MMSA

UMB operates 31 branch offices and 154 ATMs in the Kansas City MMSA. UMB offers its full range of products and services in the Kansas City MMSA. However, the bank's primary focus is commercial lending and banking. As of June 30, 2016 UMB had \$10.34 billion in deposits in the Kansas City MMSA and was the largest bank in terms of deposits. The largest banks after UMB were Commerce Bank, Bank of America, N.A., U.S. Bank N.A., and Capitol Federal Savings Bank.

Refer to the community profile for the Kansas City MMSA in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

¹ This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

Scope of Evaluation in Kansas City MMSA

UMB has one AA in the Kansas City MMSA. Thus, we performed a full-scope review on the Kansas City MMSA. Our ratings were based on the performance in the Kansas City MMSA. Refer to the table in Appendix A for more information.

We contacted two non-profit housing-related organizations within the AA during the evaluation. The organizations described the following needs within the AA:

- Better access to affordable home purchase loans
- Access to affordable home repair loans;
- The need for a CDFI to operate a loan pool for people that do not meet traditional credit standards for home repairs and purchase loans in the area;
- Creative credit help for those residents who are “upside down” (have negative equity) in their homes;
- Provide small dollar loans (\$500-\$2,500) for small businesses; and
- Provide financial education and counseling for area residents and small business owners.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN (Kansas City MMSA)

LENDING TEST]

Conclusions for Areas Receiving Full-Scope Reviews

The bank’s performance under the lending test in the Kansas City MMSA is rated “High Satisfactory”. Based on full-scope reviews, the bank’s performance in the MMSA is good.

Lending Activity

Lending activity in the Kansas City MMSA is good, considering strong competition for all types of loans within this AA. According to the June 30, 2016 FDIC Summary of Deposit Report, UMB had a 19.61 percent deposit market share. UMB ranked 1st out of 131 deposit-taking institutions in the AA. We gave small business lending the most consideration in our evaluation of performance within the Kansas City MMSA because it represents the largest volume of loans in the AA portfolio.

Refer to Table 1 Lending Volume in the Kansas City MMSA section of Appendix D for the facts and data used to evaluate the bank’s lending activity.

According to 2015 Peer Mortgage Data, UMB ranked 57th out of 525 home purchase lenders in the AA. UMB had a 0.41 percent market share, which ranked in the top 10.86 percent of all

lenders in the AA. UMB ranked 48th out of 201 lenders in home improvement loans in the AA. UMB had a 0.43 percent market share of home improvement loans, which ranked in the top 23.88 percent of all lenders in the AA. UMB ranked 34th out of 429 lenders in providing home mortgage refinance loans in the AA. UMB had a 0.59 percent market share, which ranked the bank in the top 7.93 percent of all home mortgage refinance lenders.

According to 2015 Peer Small Business Data, UMB ranked 10th in the number of small business loans originated in the AA. UMB had a 2.41 percent market share of small business loan originations. This ranked the bank in the top 7.46 percent of all lenders. The top lenders in terms of number of small business loan originations have large credit card offerings, with much smaller average loan amounts. The top five competitors had a 49.93 percent market share of small business loan originations. UMB's market share, if measured by loan volume was 13.98 percent. UMB ranked 1st in dollar volume of small business loans in the Kansas City MMSA. UMB made \$62.68 million more in small business loans than its closest competitor in the AA. UMB ranks 9th in terms of originations of small farm loans. UMB has a 3.25 percent market share of originations, which ranked the bank in the top 27.27 percent of all lenders. There is strong competition for small farm loans in the AA. The top five lenders have a 64.21 percent market share of small farm originations. UMB's market share of small farm loans by loan volume is 9.03 percent, which ranks 3rd.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans is good. We placed greater weight on the bank's small loans to business lending as it represented the majority of the bank's CRA reportable lending activity.

Home Mortgage Loans

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

The overall geographic distribution of home mortgage loans is adequate. In evaluating geographic distribution of home loans in the Kansas City MMSA, it is important to note that the low-income census tracts contain a low-percentage of owner-occupied housing. There are also higher percentages of rental and vacant units in AA's low-income geographies. This can present a challenge for banks when attempting to originate home mortgages in low-income geographies in the AA.

The geographical distribution of home purchase loans is poor. The percentage of loans in low-income geographies is significantly lower than the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income geographies is somewhat lower than the percentage of owner-occupied units in these geographies. The bank's market share of loans in low-income geographies is significantly below its overall market share. The bank's market share of loans in moderate-income geographies is significantly greater than its overall market share.

The geographical distribution of home improvement loans is adequate. The percentage of loans made in low-income geographies is somewhat lower than the percentage of owner-

occupied units in these geographies. The percentage of loans made in moderate-income geographies is near to the percentage of owner-occupied units in these geographies. The bank's market share of loans in low-income geographies is significantly lower than its overall market share. The bank's market share of loans in moderate-income geographies is below its overall market share.

The geographical distribution of home mortgage refinance loans is adequate. The percentage of loans made to low-income geographies is lower than the percentage of owner-occupied housing units in these geographies. The percentage of loans made to moderate-income geographies is lower than the percentage of owner-occupied housing units. The bank's market share of home mortgage refinance loans to low-income geographies significantly exceeds its overall market share. The bank's market share of loans to moderate-income geographies substantially meets its overall market share of home mortgage refinance loans.

Small Loans to Businesses

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

The overall geographic distribution of small loans to businesses is excellent. This is based on the full-scope review in the Kansas City MMSA.

The geographic distribution of small loans to businesses in the Kansas City MMSA is excellent. The percentage of loans made in low-income geographies significantly exceeds the percentage of businesses in those geographies. The percentage of loans made in moderate-income geographies exceeds the percentage of businesses within those geographies. The bank's market share of loans in low-income geographies significantly exceeds its overall market share. The bank's market share in moderate-income geographies exceeds its overall market share.

Small Loans to Farms

Refer to Table 7 in the "Kansas City MMSA" section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

The overall geographic distribution of small loans to farms is poor. This is based on the full-scope review in the Kansas City MMSA. Just 3.15 percent of farms were located in low-income census tracts, thus more weight was placed on performance in moderate-income census tracts.

The geographic distribution of small loans to farms is poor. The percentage of loans made to low- and moderate-income geographies is significantly lower than the percentage of farms in those geographies. The bank's market share of loans to low-income geographies is significantly below its overall market share. The bank's market share of loans to moderate-income geographies significantly exceeds its overall market share.

Lending Gap Analysis

We reviewed summary reports, maps, analyzed UMB's home mortgage, and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The overall distribution of lending by income level of borrower is adequate. We placed greater weight on the bank's small loans to business lending as small loans to businesses represented the majority of the bank's CRA reportable lending activity.

Home Mortgage Loans

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

The distribution of home mortgage lending by income level of borrower is excellent. In performing our analysis of home mortgage lending, we considered the general affordability of housing to low- and moderate-income borrowers. The relatively high housing costs compared to low- and moderate-income family income levels somewhat impacts these borrowers' ability to purchase homes.

The borrower distribution of home purchase loans is excellent. The percentage of loans made to low-income borrowers is lower than the percentage of low-income families. The percentage of loans made to moderate-income borrowers significantly exceeds the percentage of moderate-income families. The bank's market shares of home purchase loans to low- and moderate-income borrowers exceed its overall market share of home purchase loans.

The borrower distribution of home improvement loans is excellent. The percentage of loans made to low-income borrowers exceeds the percentage of low-income families. The percentage of home improvement loans made to moderate-income borrowers significantly exceeds the percentage of moderate-income families. The bank's market shares of home improvement loans to low- and moderate-income borrowers significantly exceed its overall market share of home improvement loans.

The borrower distribution of home mortgage refinance loans is good. The percentage of loans made to low-income borrowers is somewhat lower than the percentage of low-income families. The percentage of loans made to moderate-income borrowers exceeds the percentage of moderate-income borrowers. The bank's market shares of home mortgage refinance loans in low- and moderate-income geographies significantly exceed its overall market share for home mortgage refinance loans.

Small Loans to Businesses

Refer to Table 11 in the "Kansas City MMSA" section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The overall distribution of small loans to businesses is poor. This is based on the full-scope review in the Kansas City MMSA.

The overall borrower distribution of small loans to small businesses in the Kansas City MMSA is poor. The percentage of small loans to small businesses (businesses with gross annual revenue of \$1 million or less) was lower than the percentage of small businesses. The bank's market share of loans was below its overall market share.

Small Loans to Farms

Refer to Table 12 in the "Kansas City MMSA" section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to farms.

The borrower distribution of small loans to farms is adequate.

The bank's performance in providing small loans to farms is adequate. The percentage of small loans to small farms (revenue less than \$1 million) was lower than the percentage of farms. The bank's market share of small loans to small farms significantly exceeded its overall market share of loans to farms.

Community Development Lending

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

The volume of CD lending had a neutral impact on the lending performance in the Kansas City MMSA. During the evaluation period, the bank originated 88 CD loans totaling \$316.59 million.

Examples of CD loans originated during this evaluation period include:

- Two loans totaling \$5.7 million that support partial financing of a New Markets Tax Credit transaction to a foundation, which is wholly owned by a non-profit organization. The borrower is an alternative school, which serves low- and moderate-income youth in the Kansas City, Missouri public school district.
- A loan for \$500 thousand to a non-profit organization to support community services to low- and moderate income individuals. The organization assists youth throughout the community to help enable programs in the focus areas of promoting healthy lifestyles, education, career development, technology, public speaking, and leadership. The organization's locations are strategically placed within the AA's poorest neighborhoods to make readily accessible to the young people who need it most.

- A loan for \$1.25 million to a non-profit organization to support community services to low- and moderate income individuals. The organization provides services for the elderly and persons with disabilities, which are offered without charge to all persons with significant disabilities.

Product Innovation and Flexibility

The bank does not have any products we consider innovative or flexible.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in the Kansas City MMSA is rated "High Satisfactory", when considering performance in the AA.

Refer to Table 14 in the "Kansas City MMSA" section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

During the evaluation period, UMB made 281 investments, grants, and donations totaling \$45.18 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the AA. The remaining balance on eight prior period investments as of the date of our examination was \$4.83 million. When considering both current and prior period investments, the total of \$50.02 million represents 4.72 percent of allocated Tier One Capital for the AA. This level is considered adequate, when considering the nearly five-year evaluation period.

UMB's responsiveness to CD needs in the AA is excellent. In terms of dollar volume, 78.88 percent of the bank's CD investments were allocated to affordable housing, which was identified as a need in the AA. The bank met this need through mortgage backed securities (MBS) low-income housing tax credits (LIHTC), a revenue bond, and an equity security. The eight LIHTC totaled \$4.59 million dollars and had a direct and greater impact on the low- and moderate-income people in the assessment area. UMB also made 114 CD donations in the AA directed towards low- and moderate-income individuals and small businesses; the total of the donations was \$379 thousand.

Examples of investments mad during the evaluation period include:

- A \$1 million LIHTC used to assist in neighborhood revitalization in Kansas City and the provision of decent, safe, and sanitary housing affordable primarily to low-income households.
- A \$3.27 million new market tax credit for rehabilitating a school in a low-income census tract in the Kansas City AA. The bank had a leadership role in issuing and subsequently purchasing this tax credit.
- A \$4.25 million lease revenue bond for a multi-purpose outreach, office and gymnasium located in Olathe, KS. The organization serves thousands of children needing critical

assistance. Many of the youth are, or have been, victims of abuse, neglect, or other family disruption. Additionally they help homeless students in Johnson County schools and homeless students in the KCK and KCMO school districts. In addition to the services provided to the community, the organization also employs over 200 low- and moderate-income persons.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

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

Retail Banking Services

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

UMB's branch distribution in the Kansas City MMSA is excellent. Branches are readily accessible to geographies and individuals of different income levels. The bank had three branches in the low-income tracts in the AA, and seven branches in the moderate-income tracts in the AA. The percentages of UMB's branches in the low-income and moderate-income geographies exceeded the percentage of population living in these geographies.

Branch openings and closings have not generally affected the accessibility of the bank's delivery systems to low- and moderate-income geographies or individuals. The bank opened one branch in an upper-income tract and closed eight branches. Due to the increased use of alternative delivery systems, branch and teller transactions have declined. The change in customers' behavior in using these alternatives has led to some branch closures. Closed branches included one in a low-income tract, two in moderate-income tracts, with the five remaining closed branches being in middle- and upper-income tracts. For those branches closed in low- to moderate-income tracts, a full service UMB branch is located within five miles.

UMB's hours and services offered throughout the MMSA do not vary in a way that inconvenience portions of the AA, particularly low- and moderate-income geographies or individuals. Services offered and hours of operation are comparable among locations regardless of income level of the geography. UMB is in partnership with the Ivanhoe Neighborhood Council a 501(c)(3) neighborhood organization. The bank maintains a cashless branch within the Nutter Ivanhoe Community Center, and provides financial education for Ivanhoe and surrounding communities. This location has limited hours on Wednesday through Friday and provides services for new accounts, accepts Bankcard payments, balance inquiries, notary, loan inquiries and applications. Customers have access to two community mortgage bankers that help to support home ownership in low- to moderate-income communities. Refer to the Description of Institution section of this document for detail regarding UMBs other alternative delivery systems.

Community Development Services

UMB provided a good level of community development services in Kansas City MMSA. The bank's efforts demonstrated good responsiveness and commitment to community needs by providing technical assistance on financial and banking related matters to community groups, low- and moderate-income persons and families. The bank conducts annual needs assessments and is responsive to the community's needs. A significant effort focused on financial literacy.

UMB staff provided their expertise to 104 different organizations that promoted community development initiatives in the MMSA. Throughout the evaluation period, 188 bank employees volunteered their time for a total of 6,188 hours, which included 104 leadership positions. Ninety-seven employees devoted 1,428 hours to financial literacy, six employees devoted 236 hours for low- and moderate-income individuals for income tax preparation, and four employees mentored four individuals with an estimated 586 hours. Employee volunteer hours totaled 708 for healthcare. CRA Officer Wentz was instrumental in organizing efforts for affordable housing and developing new partnerships with other banks and nonprofit organizations. The following are some examples of CD services provided by employees:

- Project Homeless Connect Kansas City is a free event where vital services are matched to those in need with the goal to end homelessness. Four UMB employees provided 140 hours of service, which promoted education and healthcare information. UMB provided financial information education on jump drives to every homeless participant, urging participants to use local libraries and nonprofits that offer free computer access. This tool allows participants to load secure information such as credit reports and resumes on the portable drive. Services also included vision testing, housing assistance information, SNAP (food stamp) application, issuance of state identification, behavioral and medical health services, and job assistance services.
- UMB provided services as a co-manager and shared in a portion of the underwriting responsibility and liability with senior firms for the Missouri Housing Development Commission (MHDC) bonds. MHDC provides a down payment assistance mortgage product across the state of Missouri. The product is targeted to low- and moderate-income borrowers and geographies. UMB is one of the entities selected by MHDC to securitize, market, and sell the bonds.

Other services include partnerships with the United Way, Nutter Ivanhoe Community Center, Credit & Homeownership Empowerment Services, Inc. (CHES, Inc.), KC CRA Series, Money Smart Kansas City, and Next Step KC:

- Individual Development Accounts are matched savings accounts that help families save towards a goal. This product is offered in partnership with the United Way of Greater Kansas City's Decade of Difference. The accounts target young adults between the ages of 16 to 26 who live in low- to moderate-income families. The young adults are connected to college, technical skills training, and/or financial management skills with opportunities to match and grow their savings through these accounts. The minimum opening deposit is \$25 and there is no minimum balance service charge.

- The Nutter Ivanhoe Community Center branch also provides educational workshops. For example, in 2017 there were 10 classes on various subjects which include but are not limited to home buying, budgeting, saving, and cyber security for seniors. UMB employees provide CD service hours for this financial literacy.
- CHES, Inc. and UMB partnership with a credit restoration program. CHES, Inc. is a HUD Certified 501(c)(3) nonprofit housing counseling financial empowerment organization. Eligible individuals are those that have had declined mortgage loan applications. UMB sponsors the discounted access to the counseling service, which is only available to individuals who were denied a loan due to credit, and/or debt-to-income related reasons. The sponsorship provides access to the six-month HUD approved credit restoration program that is valued at \$694. Participants are charged only \$55. In addition, two employees donated six hours to the organization to empower low- and moderate-income individuals for homeownership success.
- KC CRA Series is a new partnership with other local financial institutions, the Kansas City Federal Reserve and FDIC's Alliance for Economic Inclusion. UMB took a leadership role in organizing three community events in 2016. These events centered on the goal of partnerships with local non-profits and banks to positively impact the low- and moderate-income community.
- Money Smart Kansas City is a partnership with UMB, the Kansas City Federal Reserve, FDIC, and other Community Organizations. This local initiative brings financial literacy to low- and moderate-income individuals and families. Employees volunteered for both Money Smart KC events and Teach Children to save programs.
- Next Step KC is a nonprofit that collaborates with UMB. In conjunction with a small dollar loan program, UMB offers a Value Checking Account that includes a UMB Convenience Checking and one Basic Savings Account with monthly service charges waived for the first 12 months. This same entity promotes financial education, and the IRS-sponsored Volunteer Income Tax Assistance (VITA) tax preparation. UMB employees became certified and prepared returns for low- and moderate-income individuals.

Multistate Metropolitan Area Rating

St. Louis MMSA

CRA rating for the St. Louis MMSA²:	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:

- Overall good lending activity, based on a good level of making small loans to businesses and adequate home mortgage performance;
- The geographic distribution of loans reflects good penetration throughout the AA. Excellent geographic distribution of small loans to businesses mitigates poor distribution of home mortgage lending;
- The distribution of borrowers reflects adequate penetration of retail customers of different incomes and businesses of different sizes;
- CD lending had a neutral impact on the lending test performance;
- Overall excellent investment performance;
- Delivery systems are reasonably accessible to all geographies and individuals of different income levels; and
- An overall adequate level of CD services that were responsive to community needs.

Description of Institution's Operations in the St. Louis MMSA

UMB operates 15 branches and 60 ATMs in the St. Louis MMSA. UMB's primary focus is commercial lending and banking. UMB offers its full range of products and services within the AA. As of June 30, 2016, UMB had a deposit market share of 1.35 percent. Bank deposits total \$1.29 billion and represent 8.18 percent of the total bank deposits. Competition for banking services in this AA is strong. The top five bank in terms of deposits are Scottrade Bank, U.S. Bank N.A., Bank of America, N.A., Stifel Bank and Trust, and Commerce Bank.

Refer to the market profile for the St. Louis MMSA in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

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

Scope of Evaluation in St. Louis MMSA

UMB has one AA in this rating area, the St. Louis MMSA. As a result of this review, we performed a full-scope analysis of the St. Louis MMSA. Our ratings are based solely on the bank's performance in the St. Louis MMSA. Refer to the tables in Appendix A for more information.

We contacted one non-profit housing organization in the assessment area. Overall, local banks are meeting the credit needs of the residents. However, the contact provided some additional things needed to better meet the credit needs of the AA such as funding a community-building fund, training for area non-profits to understand the financing needed for community development, and a better relationship between banks and area non-profit companies to understand the credit needs within the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN St Louis MMSA

LENDING TEST

The overall lending test rating in the St. Louis MMSA is "Low Satisfactory". This is based on the full-scope review of the St. Louis MMSA.

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in the St. Louis MMSA is rated "Low Satisfactory". Based on full-scope reviews, the bank's performance in the St. Louis MMSA is adequate.

Lending Activity

Refer to Table 1 Lending Volume in the "St. Louis MMSA" section of appendix D for the facts and data used to evaluate the bank's lending activity.

Lending activity in the St. Louis MMSA is good. This is based on strong competition for all types of loans in the AA. According to June 30, 2016 FDIC Summary of Deposit Report, UMB had an overall deposit market share of 1.35 percent. UMB's deposit market share ranked the bank 14th out of 132 deposit-taking institutions in the AA. This ranked UMB in the top 10.61 percent of deposit taking institutions in the AA. We gave the most weight to small business lending since it totals approximately 75 percent of the bank's CRA reportable loans in the AA.

Home mortgage lending in the AA is adequate. According to 2015 Peer Mortgage Data, UMB had a 0.07 percent market share of home purchase loans in the AA. This ranked the bank 129th out of 492 lenders in the AA. UMB ranked in the top 26.22 percent of all lenders for home purchase loan originations. The top five lenders had a combined market share of home purchase loans of 27.93 percent. UMB had a 0.14 percent market share of home mortgage refinance originations. This ranked the bank 98th out of 463 lenders in home mortgage refinance originations. This placed the bank in the top 21.17 percent of all lenders. The top five lenders combined for a market share of 25.49 percent.

Small business lending activity is good. According to 2015 Peer Small Business Data, UMB had an overall 0.76 percent market share of small business loans originations. The bank ranked 23rd out of 94 lenders in the AA, which ranked the bank in the top 16.43 percent of all lenders for small business loan originations. The top five lenders in the market all originate many credit cards with small average loan balances. The top five lenders combined market share of small business loan originations totals 56.49 percent of total originations. UMB small business loans activity by dollar volume ranks eighth. UMB's market share by dollar volume is 3.97 percent, which is higher than its deposit market share.

Distribution of Loans by Income Level of the Geography

The geographic distribution of loans reflects good penetration throughout the AA. We placed greater weight on the bank's small loans to businesses, because small loans to businesses make up approximately 75 percent of the bank's CRA reportable lending.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the "St. Louis MMSA" section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The overall geographic distribution of home mortgage loans is poor.

The geographic distribution of home purchase lending is poor. The percentage of loans to low-income geographies was significantly lower than the percentage of owner-occupied housing in these geographies. The percentage of loans in moderate-income geographies was lower than the percentage of owner-occupied housing. The bank's market share of home purchase loans in low-income census tracts was significantly below its overall market share. The bank's market share in moderate-income geographies significantly exceeded its overall market share.

The geographic distribution of home mortgage refinance loans is poor. The percentage of loans to low-income geographies was significantly lower than the percentage of owner-occupied housing in these geographies. The percentage of loans in moderate-income geographies was somewhat lower than the percentage of owner-occupied housing. The bank's market share of home mortgage refinance loans in low-income census tracts was significantly below its overall market share. The bank's market share in moderate-income geographies significantly exceeded its overall market share.

Small Loans to Businesses

Refer to Table 6 in the "St. Louis MMSA" section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of small loans to businesses is excellent. The percentage of loans made in low-income geographies significantly exceeds the percentage of businesses within those geographies. The percentage of loans in moderate-income geographies significantly

exceeds the percentage of businesses in those geographies. The bank's market shares in both low- and moderate-income geographies significantly exceed its overall market share.

Lending Gap Analysis

We reviewed summary reports, maps, analyzed UMB's home mortgage, and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The distribution of borrowers reflects adequate penetration of retail customers of different incomes and businesses of different sizes. We gave more weight in our analysis to small business loans. This is because small business loans make up approximately 86 percent of the bank's CRA reportable loan originations in the AA.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the "St. Louis MMSA" section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The borrower distribution of home mortgage loans is excellent. In performing our analysis of home mortgage lending, we considered the general affordability of housing to low- and moderate-income borrowers. The relatively high housing costs compared to low-income family income levels somewhat affects these borrowers' ability to purchase homes.

The borrower distribution of home purchase loans is excellent. The percentage of home purchase loans to low-income borrowers is near the percentage of low-income families. The percentage of loans to moderate-income borrowers significantly exceeds the percentage of moderate-income families. The bank's market share of loans to low-income borrowers is lower than its overall market share. The bank's market share of loans to moderate-income borrowers is significantly greater than its overall market share.

The borrower distribution of home mortgage refinance loans is excellent. The percentage of home mortgage refinance loans to low-income borrowers is somewhat lower than the percentage of low-income families. The percentage of loans to moderate-income borrowers significantly exceeds the percentage of moderate-income families. The bank's market share of loans to low- and moderate-income borrowers exceeds its overall market share in the AA.

Small Loans to Businesses

Refer to Table 11 in the "St. Louis MMSA" section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The distribution of borrowers by income level is very poor. The percentage of small loans to small businesses (businesses with revenue less than \$1 million) is significantly below the

percentage of small businesses. The bank's market share of small loans to small businesses is significantly below its overall market share.

Community Development Lending

Refer to Table 1 Lending Volume in the "St. Louis MMSA" section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, Table 5 includes borrower lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list community development loans, however.

The volume of CD lending had a neutral impact on the lending performance in the St. Louis MMSA. During the evaluation period, the bank originated 56 CD loans totaling \$185.89 million.

Examples of the CD loans originated during this evaluation period include:

- A renewal of a \$500 thousand loan to a nonprofit organization, which supports community services to low- and moderate-income individuals or families. The organization provides primary healthcare to meet the health needs to impoverished and uninsured populations within the AA. The primary location of the health center is in a low-income census tract.
- A loan for \$1.5 million to a nonprofit organization, which provides vocational services for low-income persons with disabilities. In addition to entry-level packaging jobs, the organization provides career counseling, job placement, and off-site opportunities to help the disabled live independently.
- A construction loan for \$3.15 million to finance the renovation of three existing facilities. The borrower is a network of five health centers, which provide professional health care services to low-income and uninsured residents. The organization also collaborates with other agencies to provide comprehensive programs for low-income individuals including day care, elder care, education, micro-business assistance, employment services, homeless and emergency services.
- A \$38 thousand participation loan to the St. Louis Economic Development Partnership, a non-profit organization. The objective of the partnership is to develop and grow diversified businesses and create employment opportunities within the AA. The loan proceeds directly support the Small Business Relief Program to target the small business community of the immediate Ferguson area. Some partnerships include the Missouri Department of Economic Development and the St. Louis Regional Chamber.

Product Innovation and Flexibility

The bank does not have any products we consider innovative or flexible.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in the St. Louis MMSA is rated "Outstanding", when considering performance in the AA.

Refer to Table 14 in the "St. Louis MMSA" section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

During the evaluation period, UMB made 242 investments, grants, and donations totaling \$19.63 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the AA. The remaining balance on three prior period investments, as of the date of our evaluation, was \$993 thousand. When considering both current and prior period investments, the bank's volume of CD investments had a significant impact on the St. Louis MMSA. The total amount of \$20.62 million in investments represents 15.63 percent of allocated Tier One Capital for the AA. This level is considered excellent, when considering the nearly five-year evaluation period.

UMB's responsiveness to CD needs in the AA is excellent. In terms of dollar volume, 69.55 percent of the bank's CD investments were focused on affordable housing, an identified need in the AA. The bank met this need through MBS and LIHTCs. The four LIHTCs totaled \$2.764 million dollars and had a direct impact on the low- and moderate-income people in the AA. UMB also made 36 CD donations totaling about \$212 thousand to various organizations for community services, economic development, and revitalization/stabilization. These donations met the needs of the AA.

Examples of investments made during the evaluation period include:

- UMB underwrote and subsequently purchased six school bonds for \$2.99 million in the St. Louis MMSA. The bonds provided funds to complete remodeling, make needed repairs, improve energy efficiency, and make safety improvements for schools with over 60 percent of students on the free or reduced lunch program.
- A \$1 million LIHTC, which was used to assist in neighborhood revitalization in St. Louis and the provision of decent, safe, and sanitary affordable housing primarily to low-income households.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in the "St. Louis MMSA" is rated "Low Satisfactory".

Retail Banking Services

Refer to Table 15 in the "St. Louis MMSA" section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

UMB's branch distribution in the St. Louis MMSA is adequate. Branches are reasonably accessible to essentially all portions of the St. Louis MMSA. The bank has no branches in low-income tracts while nearly nine percent of the population resides in these areas. As a result, the percentage of branches in low-income tracts is significantly below the percentage of population residing in those tracts. UMB has four branches in the moderate-income tracts in the AA and 18 percent of the population resides in those tracts. The percentage of branches in the moderate-income tracts exceeds the percentage of populations residing in those tracts.

The bank closed seven branches. The bank's closure of its only branch in a low-income tract impacted the accessibility of the bank's delivery systems to low- and moderate-income geographies or individuals. The impact of the closure was mitigated because bank customers have decreased the number of branch and teller transactions due to the increased use of alternative delivery systems. To maintain branches located in low- and moderate-income geographies, efforts were made to cross train employees to meet customer needs. As a result, this new branch model enables the bank to retain branches by making them more cost effective and using branch employees with a diverse skill set to meet customer needs. This model was applied to two branches within moderate-income tracts. Branch closings affected one low-income tract, three middle-income tracts, and three upper-income tracts. For the branch closed in low-income tract, a full service UMB branch is located within five miles. In addition, there are other financial institutions in the area.

UMB's hours and services offered throughout the MMSA do not vary in a way that inconveniences portions of the AA, particularly low- and moderate-income geographies or individuals. Services offered and hours of operation are comparable among locations regardless of the income level of the geography. Refer to the Description of Institution section of this document for details regarding UMBs other alternative delivery systems.

Community Development Services

UMB provided an adequate level of community development services in the St. Louis MMSA. The bank's efforts demonstrated an adequate responsiveness and commitment to community needs by providing technical assistance on financial and banking-related matters to community groups and low- and moderate-income persons and families.

UMB staff provided their expertise to 18 different organizations, which included 15 leadership positions. Throughout the evaluation period, 16 bank employees volunteered their time for a total of 491 hours. A majority of the CD service hours were offered through technical assistance and board service.

Examples of services include:

- One employee served as a board member for Grace Hill Business Center. This entity focuses on underserved communities where individuals are seeking to start a small business. The organization aids with business plans and access to capital. Individuals get one-on-one aid with nearly all applicants being low-income women.
- Two employees provided leadership to organizations that benefited low- and moderate-income children and their families. One organization provides behavioral health services and another organization serves those with no medical insurance or are under-insured.

- UMB provided services as a co-manager and shared in a portion of the underwriting responsibility and liability with senior firms for the Missouri Housing Development Commission (MHDC) bonds. MHDC provides a down payment assistance mortgage product across the state of Missouri. The product is targeted to low- and moderate-income borrowers and geographies. UMB is one of the entities selected by MHDC to securitize, market, and sell the bonds.

State Rating

State of Arizona

CRA Rating for Arizona³:	Satisfactory
The lending test is rated:	Low Satisfactory
The investment test is rated:	Outstanding
The service test is rated:	Needs to Improve

The major factors that support this rating include:

- An adequate level of lending for home mortgage loans and small loans to businesses;
- Overall good geographic distribution of loans. Excellent performance in providing small business loans to low- and moderate-income geographies mitigates poor geographic distribution of home mortgage lending;
- The borrower distribution of lending reflects very poor penetration, based on poor distribution of lending to retail customers of different income levels and very poor distribution of lending to business customers of different sizes;
- CD lending had a neutral impact on lending test performance;
- Overall excellent investment performance, when considering performance in the Phoenix AA and the broader statewide area;
- Delivery systems are unreasonably accessible to low- and moderate-income individuals; and
- Bank personnel provided a good level of community development services during the evaluation period.

Description of Institution's Operations in Arizona

UMB has one AA within the state of Arizona, the Phoenix MSA (Phoenix AA). The Phoenix AA is new to UMB and is the result of a charter consolidation. The Phoenix AA will be analyzed from January 1, 2013 through December 31, 2016. As of December 31, 2016, UMB operated seven branches in the Phoenix AA. UMB offers its full range of products and services in the Phoenix AA.

There is strong competition in the Phoenix AA for deposits. According to the June 30, 2016 FDIC summary of Deposit report, UMB has deposits totaling \$545.98 million. UMB's market

³ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

share ranks 17th out of 66 deposit-taking institutions in the Phoenix AA. UMB's market share of deposits ranks the bank in the top 30 percent of all deposit taking institutions in the Phoenix AA. Overall, the Phoenix AA has 3.47 percent of the bank's total deposits. The largest banks in terms of deposits in the AA are JPMorgan Chase Bank, N.A., Wells Fargo Bank, N.A., Bank of America, N.A., Western Alliance Bank, and Compass Bank.

Refer to the market profiles for the state of Arizona in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Arizona

We conducted a full-scope analysis of the Phoenix AA for this review. The Phoenix AA is the only AA in the state, thus we relied on the Phoenix AA performance to arrive at our state of Arizona ratings. The bank did not originate enough home improvement loans, multifamily loans, or small farm loans to analyze. Within the state of Arizona, we gave the most weight to small loans to businesses because small loans to businesses totaled approximately 79 percent of the loan originations in Arizona during the evaluation period.

We contacted two non-profit business organizations in the AA that were pleased with the activities of local banks. The only request was for local banks to develop more innovative products and services to help small businesses.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Arizona is rated "Low Satisfactory". Based on full-scope reviews, the bank's performance in the Phoenix AA is adequate.

Lending Activity

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

The bank's lending activity performance in the state of Arizona is adequate.

Based on the June 30, 2016 FDIC Deposit Market Share Data, UMB ranked 17th out of 66 lenders in the Phoenix AA. UMB's deposit market share ranks them in the top 29.82 percent of all deposit-taking institutions in the AA. Based on 2015 peer mortgage data, UMB achieved a market share of 0.01 percent for home purchase lending in the AA. UMB's home purchase performance ranked 278th out of 650 lenders in the Phoenix AA. UMB's ranking put them in the top 42.77 percent of home purchase lenders in the Phoenix AA. There is ample competition in the Phoenix AA for home purchase lending; the top five lenders accounted for 29.80 percent of all home purchase originations. UMB ranked 225th out of 569 lenders in the Phoenix AA for home refinance originations. UMB achieved 0.02 percent market share for home mortgage refinances, UMB's market share ranked them in the top 39.54 percent of all

home mortgage refinance lenders in the Phoenix AA. The top five lenders in the Phoenix AA combined for a 31.79 percent total market share.

UMB achieved a 0.13 percent market share of small loans to businesses originations, ranking 30th among 175 reporting lenders, which is equivalent to the top 17.16 percent of lenders. UMB ranked 19th in lending volume, this is due to the fact that UMB has a significantly larger average loan size than all banks ranked ahead of it in loan originations, with one exception. The small business lending activity is good given UMB's market share and ranking when compared to the deposit market share and small business lending competition within the AA. The top five lenders for small loans to business consisted of the nation's largest credit card lenders, which collectively, had 69.63 percent of the market share of loan originations.

Distribution of Loans by Income Level of the Geography

The geographic distribution of loans represents good penetration throughout the AA.

Home Mortgage Loans

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

The overall geographic distribution of home mortgage loans is poor.

The overall geographic distribution of home purchase loans is poor. It is important to note that, according to 2010 US Census data; low-income census tracts contained only 3.61 percent of total owner-occupied housing in the Phoenix AA.

The overall geographic distribution of home purchase loans is poor. The percentage of loans in low-income geographies is significantly lower than the percentage of owner-occupied units in low-income geographies. The percentage of loans in moderate-income geographies is significantly below the portion of owner-occupied units in these geographies. The bank's market share for home purchase loans in low- and moderate-income geographies were below its overall loan market share in the Phoenix AA.

The overall geographic distribution of home refinance mortgages is adequate. The percentage of loans in low-income geographies is near the percentage of owner-occupied housing units in these geographies. The percentage of loans in moderate-income geographies is significantly lower than the percentage of owner-occupied units in these geographies. UMB's market share in low-income geographies is significantly below its overall loan market share. UMB's market share in moderate-income geographies substantially meets its overall loan market share in moderate-income geographies.

Small Loans to Businesses

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

The overall geographic distribution of small loans to businesses is excellent.

The percentage of small loans to businesses made in low-income geographies significantly exceeds the percentage of businesses in those geographies. The percentage of small loans to businesses made in moderate-income geographies significantly exceeds the percentage of businesses in those geographies. The bank's market share in low-income geographies significantly exceeds its overall market share for small loans to businesses. The bank's market share in moderate-income geographies significantly exceeds its overall market share for small loans to businesses.

Lending Gap Analysis

We reviewed summary reports, maps, and analyzed UMB's home mortgage, and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The distribution of borrowers reflects very poor penetration of retail customers of different income levels and business customers of different sizes.

Home Mortgage Loans

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

The overall borrower distribution of home mortgage loans is poor. In evaluating the borrower distribution of home loans in the Phoenix MSA, we noted that 12 percent of the families in the AA (2010 U.S. Census) are below the poverty level.

The overall borrower distribution of home purchase loans is poor. The percentage of loans made to low-income borrowers is significantly lower than the percentage of families in these geographies. The percentage of loans made to moderate-income borrowers is significantly lower than the percentage of families in these geographies. UMB's market share of loans to low-income borrowers was significantly below its overall market share of home purchase loans in the Phoenix AA. UMB's market share of loans made to moderate-income borrowers substantially meets the bank's overall market share of home purchase loans in these geographies.

The overall distribution of home mortgage refinance loans is poor. The percentage of loans made to low-income borrowers is significantly lower than the percentage of low-income families in these geographies. The percentage of loans made to moderate-income borrowers is below the percentage of moderate-income families in these geographies. UMB's market share of loans to low-income borrowers was significantly below its overall home refinance market share. UMB's market share of home refinance loans to moderate-income borrowers was below its overall market share of home refinance loans in the Phoenix AA.

Small Loans to Businesses

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

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

The overall distribution of small loans to businesses is very poor. The percentage of small loans to small businesses (businesses with gross annual revenue of \$1 million or less) was significantly below the percentage of small businesses. The bank's market share was significantly below its overall performance in providing loans to small businesses.

Community Development Lending

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

The volume of CD lending had a neutral impact on the lending performance in the Phoenix AA. During the evaluation period, the bank originated 18 CD loans totaling \$72.03 million, or 128.79 percent of Tier One Capital allocated to the AA.

Product Innovation and Flexibility

The bank does not have any products we consider innovative or flexible.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Arizona is rated "Outstanding". Based on a full-scope review, the bank's performance in the Phoenix AA is excellent.

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

During the evaluation period, UMB made 25 investments, grants, and donations totaling \$4.8 million. UMB had no outstanding investments within the AA made prior to the current evaluation period. Total qualifying investments represent 8.59 percent of allocated Tier One Capital for the AA. This level of qualifying investments demonstrates excellent performance by the bank to meet CD needs of the AA.

UMB's responsiveness to CD needs in the AA is excellent. In terms of dollar volume, 99.10 percent of the bank's CD investments were considered responsive to identified needs in the AA. Affordable housing was identified as a need in the AA in 2013, in which the bank purchased two mortgage-backed securities that aggregated \$1.52 million and provided housing to low- and moderate-income individuals. Educational opportunities was also an identified need for the AA, in which the bank purchased a school bond in the amount of \$3.22 million that provided funding for improvements to schools that primarily serve low- and moderate-income students. UMB also made 22 CD donations in the AA directed towards providing community services to low- and moderate-income individuals, the total of the donations was \$58 thousand.

Examples of investments made during the evaluation period include:

- A \$2.37 million MBS, comprised of 17 mortgage loans to low- and moderate-income borrowers, with seven of the loans, or \$1.083 million, located in the Phoenix MSA. This investment provides affordable housing to low- and moderate-income individuals in the area.

- A \$3.15 million MBS, comprised of 22 mortgage loans to low- and moderate-income borrowers, with three of the loans, or \$441 thousand, located in the Phoenix MSA. This investment provides affordable housing to low- and moderate-income individuals in the area.
- A \$3.22 million school bond that provides funding for improvements and remodeling of existing school buildings, including furniture, fixtures, and equipment. The school district is comprised of 115 school, all of which have greater than 50 percent of their students eligible for the federal free and reduced lunch program. This investment provides services to low- and moderate-income students.

Investments – Arizona statewide

When considering the investments made in the Phoenix MSA, along with investments in the greater Arizona statewide area, this performance had a nominal impact on the overall Investment Test rating in the state. In addition to the CD investments that benefit the bank's Phoenix AA, UMB made one qualifying investment totaling \$20 thousand during the evaluation period in the broader statewide area. The investment did not have a purpose mandate or function to serve the bank's AA in the state.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Arizona is rated "Needs to Improve". Based on a full-scope review, the bank's performance in the Phoenix MSA is adequate.

Retail Banking Services

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

UMB's branch distribution in the AA is very poor. Branches are not reasonably accessible to geographies and individuals of different income levels. The bank has no branches in low-income tracts, where nearly nine percent of the population resides. The bank has no branches in moderate-income tracts, where nearly 25 percent of the population resides. The percentages of branches in the low- and moderate-income tracts are significantly below the percentage of populations residing in those tracts. All seven UMB branches are in the middle-income and upper-income tracts in the MSA.

Branch openings and closing have generally not affected the accessibility of the bank's delivery systems to low- and moderate-income geographies or individuals. The bank opened ten branches and closed three branches. All three closed branches were in upper-income tracts, and were closed in the consolidation of existing branches that overlapped with branches acquired in the Meridian acquisition.

UMB's hours and services offered throughout the AA do not vary in a way that inconveniences portions of the AA, particularly low- and moderate-income geographies or individuals. Services offered and hours of operation are comparable among locations. Refer to the Description of Institution section of this document for detail regarding UMBs other alternative delivery systems.

Community Development Services

UMB provided a good level of community development services in the Phoenix MSA. UMB staff provided their expertise to six different organizations, which included six leadership positions that promoted community development initiatives in the AA. Throughout the evaluation period, six bank employees volunteered their time for a total of 898 hours.

Examples of services provided during the evaluation period include:

- One employee held a leadership role with Community Information and Referral Services. Services for this hotline include information on homeless shelters, domestic abuse shelters, food, utility assistance, mortgage delinquency, and default counseling.
- Three UMB employees were active in leadership positions with the Boys & Girls Clubs of Greater Scottsdale. This organization serves low- and moderate-income youth.

State Rating

State of Colorado

CRA Rating for Colorado⁴:	Satisfactory
The lending test is rated:	Low Satisfactory
The investment test is rated:	Outstanding
The service test is rated:	High Satisfactory

The major factors that support this rating include:

- Lending activity is good, based on adequate mortgage lending and good small dollar lending to businesses;
- Overall, the bank geographic distribution of lending is good. Excellent performance providing small loans to businesses mitigates poor mortgage lending in various geographies;
- The distribution of lending to borrowers of different income levels reflects very poor penetration based on poor home mortgage lending and very poor small business lending;
- CD lending had a neutral impact on lending test performance;
- Overall excellent investment performance, when considering performance in all Colorado AAs and the broader statewide area;
- Delivery systems are accessible to low- and moderate-income individuals; and
- Bank personnel provided an excellent level of community development services during the evaluation period.

Description of Institution's Operations in Colorado

UMB operates 12 branches and 14 ATMs within the two AAs in the state of Colorado. The Colorado AAs include the Denver MSA and Colorado Springs MSA. As of June 30, 2016 UMB had \$1.3 billion in deposits within Colorado. UMB has an overall deposit market share in Colorado of 1.04 percent, which ranks 19th out of 141 deposit taking institutions. The state of Colorado accounts for 8.26 percent of UMB bank deposits. UMB originated approximately 14 percent of its CRA reportable loans in Colorado during the evaluation period. Approximately 84 percent of CRA reportable loan originations in Colorado were small loans to business.

⁴ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Refer to the market profiles for the state of Colorado in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Through our community contact program, we identified a number of low- and moderate-income banking needs for the Denver MSA. The following is reflective of over 300 thought leaders from the public, private, and nonprofit sectors who gathered to address the lack of housing stock, the escalating price of single family and rental housing and the dearth of housing units forecasted, in particular housing *affordable* to low- and moderate-income families. The common theme was inventory and access. Access to safe, decent, and affordable housing specifically tailored to low- and moderate-income families is paramount. In addition, jobs paying a livable wage remain elusive for many low- and moderate-income families, thus exacerbating their affordable housing dilemma; job training and job placement programs also continue to be important. Consequently, there are opportunities for financial institution involvement in addressing these community needs within the AA. However, given the large number of banks serving the Denver MSA, competition for community development activities is strong.

Scope of Evaluation in Colorado

In the state of Colorado, we conducted a full-scope review of the Denver MSA. We conducted a limited-scope review in the Colorado Springs MSA. We selected the Denver MSA for the full-scope review since it had the majority of deposits, loans, and branches in the state of Colorado. The Denver AA has 77.39 percent of all UMB deposits in Colorado, for an approximate total of \$1.01 billion deposits. The Denver MSA accounts for over 83 percent of all UMB loans originated in the state of Colorado. The Denver MSA has 66.67 percent of the bank's branches located in the state of Colorado. The ratings in this state will be based primarily on performance in the full-scope AA. Additionally, we will put more weight on the bank's performance in small business lending because small business lending makes up over 83 percent of the bank's loan originations in the state of Colorado. UMB did not originate enough multifamily and home improvement loans to have them considered as a primary product for analysis throughout the evaluation period.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Colorado is rated "Low Satisfactory". Based on a full-scope review, the bank's performance in the Denver MSA is adequate.

Lending Activity

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

The bank's overall lending activity is good, considering the strong competition for all types of loans. This is based primarily on the full-scope analysis. Based upon the June 30, 2016 FDIC Deposit Market Share Data, UMB is ranked 15th out of 70 deposit taking institutions in the

Denver AA. UMB's deposit market share ranks it in the top 21.43 percent of all deposit taking institutions.

Home mortgage lending activity in the Denver MSA is adequate. Based on 2015 Peer Mortgage Data, UMB ranked 197th out of 610 home purchase lenders in the AA. UMB home purchase lending activity ranked in the top 32.30 percent of all home purchase lenders in the AA. Overall UMB has 0.04 percent market share of home purchase loans in the AA. The overall market share of home purchase loans is lower than the deposit market share. There is a competitive market for home purchase loans in this AA, with large nationwide lenders and finance companies all competing in the Denver MSA. Overall, the top five lenders accounted for 25.21 percent of all home purchase loans in this AA. UMB's home mortgage refinance activity ranked 210th out of 610 lenders in the AA. UMB home mortgage refinance activity was in the 34.59 percent of all lenders in the AA. UMB's market share of home mortgage refinance loans was 0.04 percent, which is much less than the bank's deposit market share. There is also a competitive market for home refinance loans in this AA, with large nationwide lenders and finance companies all competing in the Denver MSA. Overall, the top five lenders accounted for 25.22 percent of all home refinance loans in this AA.

Small business lending activity in the Denver MSA is good. UMB achieved a 0.61 percent market share of small loans to businesses, ranking 20th among 162 reporting lenders, or the top 12.35 percent of lenders. UMB ranks 9th in terms of dollar volume of small business loans originations. UMB has a higher average loan balance than the top 12 lenders in terms of loan originations. UMB dollar volume of small business loans exceeds its overall deposit market share in the Denver MSA. There is a competitive market for small loans to businesses with the top five lenders consisting of large national banks. The top five small business loan originators account for 69.17 percent of all small business loans originations.

Distribution of Loans by Income Level of the Geography

Overall, the bank geographic distribution of lending is excellent. This is based on excellent performance in small loans to businesses and adequate performance in home mortgage lending. Small loans to businesses received more weight, due to the fact they make up approximately 85 percent of the CRA reportable loan originations in the AA.

Home Mortgage Loans

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

The overall geographic distribution of home mortgage loans in the Denver MSA is adequate.

The geographic distribution of home purchase loans is good. The percentage of loans in low-income geographies was near the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income geographies was somewhat lower than the percentage of owner-occupied units in these geographies. The bank's market share in low-income geographies substantially meets its overall market share of home purchase loans in these geographies. The bank's market share in moderate-income geographies is significantly below its overall market share of home purchase loans in these geographies.

The geographic distribution of home mortgage refinance loans is poor. The percentage of loans in low-income geographies is somewhat lower than percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income geographies is lower than the percentage of owner-occupied housing in these geographies. UMB's market share of low-income refinance loans is well below the bank's overall market share for refinance loans in this AA. UMB's market share of moderate-income loans is below its overall market share for home mortgage refinance loans.

Small Loans to Businesses

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

The overall geographic distribution of small loans to businesses is excellent.

The overall geographic distribution of small loans to businesses is excellent. UMB's performance in low- and moderate-income geographies significantly exceeds the percentage of businesses in those geographies. UMB's market share in low- and moderate-income geographies exceeds its overall market share for small loans to businesses in the Denver MSA.

Lending Gap Analysis

We reviewed summary reports, maps, analyzed UMB's home mortgage, and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in Colorado is very poor. This is based on a full-scope performance in the Denver MSA. Small loans to business received more weight due to the fact they make up approximately 85 percent of the CRA reportable loan originations in the AA.

Home Mortgage Loans

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

The overall borrower distribution of home mortgage loans is poor. In performing our analysis of home mortgage lending, we considered the general affordability of housing to low- and moderate-income borrowers. The relatively high housing costs compared to low- and moderate-income family income levels somewhat impacts these borrowers' ability to purchase homes.

The borrower distribution of home purchase mortgage loans is poor. The percentage of loans to low-income borrowers was lower than the percentage of low-income families in the AA. The percentage of loans made to moderate-income borrowers was below the percentage of moderate-income families. The bank's market share of home purchase loans to low-income borrowers significantly exceeds its overall market share of home purchase loans in the AA. The bank's market share of home purchase loans to moderate-income borrowers was significantly below its overall market share of home purchase loans in the AA.

The borrower distribution of home refinance loans is poor. The percentage of loans made to low-income borrowers in the AA was significantly lower than the percentage of low-income borrowers in the AA. The percentage of loans made to moderate-income borrowers is somewhat lower than the percentage of moderate-income borrowers in the AA. The bank's market share of home refinance loans to low-income borrowers is lower than the bank's market share of home refinance loans in the AA. The percentage of home refinance loans made to moderate-income borrowers is lower than the bank's market share of home refinance loans in the AA.

Small Loans to Businesses

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

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

The overall borrower distribution of small loans to businesses is very poor. The percentage of small loans to small businesses (businesses with gross annual revenue of \$1 million or less) was significantly below the percentage of small businesses. UMB's market share of loans to small businesses was significantly below its overall market share of loans to small businesses.

Community Development Lending

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

The volume of CD lending had a neutral impact on the lending performance in the Denver MSA. During the evaluation period, the bank originated 57 CD loans totaling \$196.86 million.

Examples of CD loans originated during the evaluation period include:

- A construction loan for \$33.2 million to finance the development of an office building in Denver. The area is designated as a mixed-use community, which is expanding and made up of eight buildings with amenities in a low-income census tract within the Colorado Enterprise Zone.
- A construction loan for \$9.83 million for affordable housing. The project consists of a 60-unit LIHTC apartment building that will provide permanent supportive housing to homeless individuals. The project is located in southwest Denver and was awarded LIHTC allocation from the Colorado Housing and Finance Authority.
- A refinance loan for \$1.5 million to a nonprofit organization that supports community services in low- and moderate-income areas. The borrower is a nonprofit that targets high risk, mentally ill, disadvantaged, and often homeless adolescents and their families.

Product Innovation and Flexibility

The bank does not have any product we consider innovative or flexible.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Colorado Springs MSA is not inconsistent with the bank's overall "High Satisfactory" performance under the lending test in Colorado. Refer to the Tables 1 through 13 in the state of Colorado section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Colorado is rated "Outstanding", when considering performance in all AAs in the state along with the greater statewide area. Based on a full-scope review, the bank's performance in the Denver MSA is excellent.

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

During the evaluation period, UMB made 89 investments, grants, and donations totaling \$10.76 million. UMB had no outstanding investments within the AA made prior to the current evaluation period. Total qualifying investments represent 10.44 percent of allocated Tier One Capital for the AA. This level of qualifying investments demonstrates excellent performance by the bank to meet the CD investment needs of the AA.

UMB's responsiveness to CD needs in the AA is excellent. In terms of dollar volume, 65.09 percent of the bank's CD investments were considered responsive to identified needs in the AA. UMB identified affordable housing as a CD need in the AA. To help fill this need, the bank purchased two MBS that aggregated to \$5.47 million and provided housing to low- and moderate-income individuals. Educational opportunities was also an identified need for the AA, and the bank purchased two school bonds totaling \$1.19 million and provided funding for construction and improvements to schools that primarily served low- and moderate-income students. Additionally, UMB made nine donations totaling \$170 thousand to organizations that provided educational opportunities to low- and moderate-income individuals. UMB also made \$129 thousand in donations to organizations that provide access to free health care services and clinics, another identified need for the AA. In total, UMB made 83 CD donations in the AA directed towards low- and moderate-income individuals, totaling \$869 thousand. We did consider the strong competition for CD investments in the AA from nationwide institutions. These institutions have much greater capacity and expertise to originate qualifying investments that are responsive to the AA's needs.

Examples of investments made during the evaluation period include:

- A \$2.88 million MBS comprised of 15 mortgage loans to low- and moderate-income borrowers located in the Denver AA. This investment provides affordable housing to low- and moderate-income individuals in the area.
- A \$2.58 million MBS comprised of 19 mortgage loans to low- and moderate-income borrowers located in the Denver AA. This investment provides affordable housing to low- and moderate-income individuals in the area.
- A \$1 million school bond, which provides funding for construction of a new school, along with infrastructure and repairs to existing school buildings. The school district has approximately 80 percent of students that are eligible for the federal free and reduced lunch program. This investment provides services to low- and moderate-income students.

Investments – Colorado Statewide

When considering the investments made in all AAs in the state, along with investments in the greater Colorado statewide area, this performance had a positive impact on the overall Investment Test rating in the state. In addition to the CD investments that benefit the bank's

AAs, UMB made two qualifying investments totaling \$121 thousand during the evaluation period in the broader statewide area. The investments did not have a purpose, mandate, or function to serve the bank's AAs in the state.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Colorado Springs MSA is not inconsistent with the bank's overall "Outstanding" performance in the state of Colorado, due to comparable levels of qualified investments. Refer to the Table 14 in the state of Colorado section of appendix D for the facts and data to support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Colorado is rated "High Satisfactory". Based on a full-scope review, the bank's performance in the Denver MSA is good.

Retail Banking Services

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

UMB's branch distribution in the AA is adequate. Branches are reasonably accessible to geographies and individuals of different income levels. The bank has two branches in low-income tracts, where nearly 12 percent of the population resides. The percentage of branches in the low-income tracts exceeds the percentage of population residing in those tracts. UMB has no branches in moderate-income tracts while nearly 24 percent of the population resides in moderate-income tracts. The percentage of branches in the moderate-income tracts is significantly below the percentage of population residing in those tracts.

Branch openings and closing improved UMB's accessibility of its delivery systems to low- and moderate-income geographies or individuals in the AA. UMB opened eight branches, with two branches being located in low-income geographies. UMB closed no branches.

UMB's hours and services offered throughout the AA do not vary in a way that inconveniences portions of the AA, particularly low- and moderate-income geographies or individuals. Services offered and hours of operation are comparable among locations. Refer to the Description of Institution section of this document for detail regarding UMB's other alternative delivery systems.

Community Development Services

UMB provided an excellent level of community development services in the Denver MSA. UMB staff provided their expertise to 37 different organizations, which included 48 leadership positions that promoted community development initiatives in the Denver MSA. Financial

literacy and healthcare were prominent areas of community service supported by bank employees, with 521 hours and 399 hours, respectively. Throughout the evaluation period, 42 bank employees volunteered their time for a total of 3,029 hours. Examples of CD services include:

- One employee provided a leadership position for the Habitat for Humanity organization for four years totaling 516 hours. Volunteer activities included working four days on home construction and fundraising. This organization provides affordable housing for low- to moderate-income individuals and families.
- One employee volunteered 44 hours for Rocky Mountain Microfinance Institution as a lending professional aiding in workshops. The UMB employee worked directly with low- and moderate-income individuals working on business plans to help startup businesses. This organization is a nonprofit that provides learning, lending, and coaching to entrepreneurs who build new businesses. The organization supports services and flexible microloans to aid the startup business.
- A UMB employee served in a leadership position for Colorado Lending Source as a loan committee member and aiding with financial education for small businesses. This organization partners with local lenders, government agencies, and resource partners to provide long term financing at low interest rates.
- Numerous UMB employees worked directly with children promoting financial literacy in conjunction with Junior Achievement, Goodwill Industries of Denver-Youth Development Program, and directly with public schools.
- One UMB employee donated 317 hours to Kids In Need of Dentistry (KIND). KIND is a nonprofit organization that provides affordable dental services to low-income miners and railroad workers. Services included a leadership role and working at fundraisers.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the service test in the Colorado Springs MSA is stronger than the bank's overall performance in the state. This performance was due to branch distribution. Performance in the limited-scope area did not have an impact on the Service Test rating in the state. Refer to Table 15 in the state of Colorado section of appendix D for the facts and data that support these conclusions.

State Rating

State of Kansas

CRA Rating for Kansas⁵:	Outstanding
The lending test is rated:	Outstanding
The investment test is rated:	Outstanding
The service test is rated:	Low Satisfactory

The major factors that support this rating include:

- An excellent level of lending for home mortgage loans and small loans to businesses;
- Overall geographic distribution of loans by income level of the geography is excellent;
- The distribution of borrowers reflects good penetration, based on good mortgage lending to retail customers of different income levels, adequate lending to businesses of different revenue levels, and good lending to farms of different revenue levels.
- Overall excellent investment performance, when considering performance in all Kansas AAs and the broader statewide area;
- Delivery systems are accessible to low- and moderate-income individuals; and
- Bank personnel provided an adequate level of community development services during the evaluation period.

Description of Institution's Operations in Kansas

UMB operates 13 branch offices and 23 ATMs in the five Kansas AAs. The AAs in the state of Kansas include Kansas non-MSA, Lawrence MSA, Manhattan MSA, Topeka MSA, and Wichita MSA. As of June 30, 2016, UMB has deposits of \$744 million in the state of Kansas. This totaled 4.73 percent of total bank deposits. UMB offers its full-range of products and services in Kansas. The bank's focus is on commercial lending and banking. The five largest deposit-taking institutions in the state of Kansas are Bank of America, N.A., Intrust Bank N.A., Capitol Federal Savings Bank, Commerce Bank, and Emprise Bank. Total CRA reportable loans in the state of Kansas equaled 12.65 percent of the bank's total CRA reportable loan originations.

⁵ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Refer to the market profiles for the state of Kansas in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Kansas

For the state of Kansas, we completed full-scope reviews of the Kansas non-MSA, the Topeka MSA, and the Wichita MSA. We conducted limited scope reviews of the Lawrence MSA and Manhattan MSA. We selected these AA's for full-scope reviews based on the fact they account for 88.64 percent of the deposits and 90.04 percent of HMDA and small business loans in the state of Kansas, respectfully. Additionally, almost 70 percent of the bank's branches located in the state of Kansas are located within the selected full-scope AAs. Ratings in this state are based primarily on the bank's performance in the full-scope AAs. Within the state of Kansas, we gave the most weight to the Kansas non-MSA. The Kansas non-MSA has more deposits, loans (including small farm), and branches than any other AA in Kansas. For our review in Kansas, UMB did not originate enough multi-family loans in any AA to conduct a meaningful analysis. Additionally, UMB did not originate enough home improvement loans in the Topeka AA and Wichita AA for analysis. We also did not review home purchase lending in the Topeka MSA because UMB did not originate 20 home purchase loans throughout the evaluation period. We conducted a review of small farm lending in the Kansas non-MSA only. Refer to the tables in appendix A for more information on the Kansas AAs.

We performed two community contacts in the Kansas non-MSA area. One was a realty company in Bourbon County and one was a community organization focused on family and community resources in Atchison County. Home improvement lending was identified as a key need in the area due to the older housing stock.

We performed a community contact in the Topeka, Kansas AA. The community contact identified down payment assistance and credit clean-up programs to low- and moderate-income individuals as primary credit needs. Opportunities to participate in community development activities are available in this AA. The contact further stated that housing for low- and moderate-income individuals and families is available; however, the selection is not very good. Additionally, down payment assistance programs are needed because many low- and moderate-income borrowers do not have the ability to make the down payment required by banks. Lastly, the contact indicated that some banks in this AA are very good at working with low- and moderate-income borrowers by offering flexible underwriting standards.

We performed a community contact in Wichita's commercial and industrial area. The contact stated that the economic conditions in Wichita are stable and the area has a diverse mix of industries providing a wide variety of products and services. The contact stated that approximately 97 percent of local businesses are considered small to medium in size, with less than 100 employees. The contact indicated that financial institutions in the area are willing and eager to lend to small businesses. In addition, financial institutions work to help grow the economy and revitalize Wichita. Overall, the contact felt that the financial institutions are meeting the credit needs in the area, particularly through small business lending.

LENDING TEST

In our assessment of the bank's performance in the state of Kansas, we placed the most weight on the Kansas non-MSA. The vast majority of UMB's HMDA, small business, and small farm lending occurred in the Kansas non-MSA. The Kansas non-MSA accounted for 72.23 percent of the loans in the full-scope rating areas. Additionally, we placed more weight on the bank's performance in small business and small farm lending across the various AA's. This is because small business and small farm lending makes up 79.57 percent of total lending in the full-scope AAs in Kansas.

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Kansas is rated "Outstanding". Based on full-scope reviews, the bank's performance in the Kansas non-MSA, Topeka MSA, and Wichita MSA is good.

Lending Activity

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

The bank's overall lending activity in Kansas is excellent. This conclusion considers competition for all types of loans. The conclusion is based primarily on performance in full-scope AAs.

Kansas non-MSA

UMB's lending activity in the Kansas non-MSA is excellent. UMB's performance in the Kansas non-MSA is highlighted by the bank's excellent performance in small farm lending and small loans to businesses.

Based on the June 30, 2016 FDIC Summary of Deposit report, UMB ranked 4th in the Kansas non-MSA for deposit market share. Based on June 30, 2016 FDIC Summary of Deposits, UMB's market share of deposits is 7.45 percent. UMB's market share of deposits ranks the bank in the top 12 percent of all deposit-taking institutions in the AA.

UMB had good performance in providing home mortgage loans within the Kansas non-MSA. UMB ranks 20th out of 136 lenders in the AA in providing financing for home purchase loans. Overall, UMB is in the top 15 percent of all home purchase lenders in the AA. UMB has a 1.56 percent market share of home purchase loans. UMB has a 3.14 percent market share of home improvement loans in the AA. UMB ranks 9th out of 261 lenders providing home improvement loans in the AA. UMB has a 4.28 percent market share of home refinance mortgage originations. UMB ranks 6th out of 120 lenders providing home refinance mortgage loans in the AA. This is equivalent to being ranked in the top six percent of all lenders.

UMB had excellent performance in providing small loans to businesses in the Kansas non-MSA. Overall, the bank ranks 4th out of 47 lenders providing small loans to businesses in the AA. UMB's small loans to businesses ranking puts UMB in the top 8.51 percent of all lenders in the AA. UMB has a total market share of 7.06 percent of small loans to business originations. The top three lenders have a market share of 40.07 of all small loans to business

originations. In terms of loan volume, UMB ranks 1st with over a 28 percent market share of loan volume. UMB's average loan size is at least 13 times larger than any of the other three lenders ranked ahead, in the number of small loans to business originations.

UMB had excellent performance in providing small farm loans. UMB ranks 1st in the Kansas non-MSA in the number of small farm loan originations and total dollar volume of the small farm loan originations. UMB has 34.74 percent of the loan originations in the AA. UMB's percentage of small farm loans significantly exceeds its overall deposit market share. UMB has over 55 percent of the small farm loan volume in the AA. There are 22 lenders providing small farm loans in the AA.

Topeka MSA

UMB's lending activity in the Topeka MSA is good. This is highlighted by overall good activity in providing small loans to businesses in the Topeka MSA.

Based on the June 30, 2016 FDIC Summary of Deposit report, UMB ranked 7th in deposit market share with 5.82 percent of all deposits in the AA. There are 22 deposit-taking institutions in the Topeka AA. UMB's deposit market share ranks in the top 31.82 percent of all deposit-taking institutions.

UMB had adequate performance in providing home mortgage lending in the Topeka MSA. UMB ranked 41st out of 141 lenders providing refinance loans in the AA. UMB had a 0.41 percent market share of home mortgage refinance loans. UMB's ranking put the bank in the top 28.82 percent of mortgage refinance lenders in the AA. UMB's ranking in providing mortgage refinance loans exceeded its overall deposit share ranking. The overall market in the AA had some competition for mortgage refinance loans with the top five lenders combining for an overall market share of 37.72 percent.

UMB had good performance in providing small loans to businesses in the Topeka MSA. UMB ranked 15th out of 41 lenders in originating small loans to businesses in the Topeka MSA. This ranking puts them in the top 31.91 percent of all lenders in the AA. This ranking is slightly lower than the bank's overall deposit market share. When considering the volume of the bank's lending, UMB ranks 4th in total dollar volume of loans funded. This is because UMB's average loan amount is at least double all other banks ranked ahead, in terms of number of loan originations. UMB's 7.06 percent market share of small loans to businesses is higher than its overall deposit market share.

Wichita MSA

UMB's lending activity in the Wichita MSA is good. This is highlighted by good small loans to business lending. The bank made a significantly greater amount of small loans to businesses, which is consistent with the business strategy. Thus, we place more weight on the bank's performance in providing small loans to businesses.

Based on the June 30, 2016 FDIC Summary of Deposit report, UMB ranked 14th out of 41 deposit-taking institutions in the Wichita MSA. UMB had a 1.08 percent share of deposits in the AA. This ranked the bank in the top 34.15 percent of deposit-taking institutions in the AA.

UMB had poor performance in providing home mortgage lending in the Wichita MSA. UMB ranked 92nd out of 225 lenders providing home purchase mortgage financing in the AA. This ranked the bank in the top 40.89 percent of all home purchase lenders in the AA. UMB had an overall market share of 0.10 percent of all home purchase lending in the AA. UMB's market share of home purchase loans is below its overall deposit market share and the bank's percentage of market share was below its overall deposit market share. Within the AA, there was moderate competition for home purchase lending. The top five home purchase lenders overall market share totaled 30 percent. UMB had a 0.17 percent market share of home mortgage refinance loans. UMB ranked 88th out of 225 lenders in the AA for home mortgage refinance loans. UMB's market share of home refinance loans ranked them in the top 39.29 percent of all home mortgage refinance lenders in the AA. UMB's market share ranked below its deposit market share. There was moderate competition in the AA for home mortgage refinance loans with the top five lenders accounting for 28.70 percent of the overall refinance market share.

UMB's lending activity providing small loans to businesses is good. UMB had a 0.71 percent market share of small loans to business originations. UMB ranked 21st out of 78 lenders in the AA providing small loans to businesses. This placed them in the top 26.92 percent of all lenders providing small loans to businesses in the AA. The bank's market share of small loans to businesses was below its overall market share. Additionally, the bank's percentage of providing small loans to businesses was below its deposit market share percentage. UMB ranks 5th in terms of dollar volume of small loans to businesses in the AA. The bank's market share of dollar volume of small loans to businesses is 4.10 percent. UMB's 4.10 percent of dollar volume of small loans to businesses is significantly greater than its deposit market share. UMB has a higher average loan amount than all other banks ranked ahead of them for number of small loans to business originations.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans by income level of the geography is excellent. This is based on UMB's performance in providing excellent geographic distribution of small loans to businesses in all full-scope AA's in Kansas. UMB also had excellent performance in providing small loans to farms in the Kansas non-MSA.

Home Mortgage Loans

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

The overall geographic distribution of home mortgage loans is adequate.

Kansas non-MSA

The geographic distribution of home mortgage loans in the Kansas non-MSA is adequate. There are no low-income census tracts located in the Kansas non-MSA, thus we based our geographical analysis solely on the bank's performance in moderate-income geographies. The percentage of home purchase loans made in moderate-income geographies is somewhat lower than percentage of owner-occupied housing in these geographies. The bank's market share of home purchase loans in moderate-income geographies is below its overall home purchase market share.

The geographic distribution of home improvement loans in the Kansas non-MSA is good. The percentage of home improvement loans in moderate-income geographies exceeds the percentage of owner-occupied housing in the Kansas non-MSA. The bank's market share of home improvement loans in moderate-income geographies is significantly below its overall market share of home improvement loans in the Kansas non-MSA.

The geographic distribution of home refinance loans is adequate. The percentage of home refinance loans in moderate-income geographies is somewhat lower than the percentage of owner-occupied housing in these geographies. The bank's market share of home refinance loans in moderate-income geographies substantially meets its overall market share for home refinance loans in the Kansas non-MSA.

Topeka MSA

The geographic distribution of home refinance mortgage loans is adequate. The percentage of loans made in low-income geographies is significantly lower than the percentage of owner-occupied housing in these geographies. The percentage of loans made in moderate-income geographies exceeds the percentage of owner-occupied housing in moderate-income geographies. The bank's market share in low-income geographies is significantly below its overall market share of home refinance loans. The bank's market share in moderate-income geographies exceeds its market share for home refinance loans.

Wichita MSA

The geographic distribution of home purchase loans is very poor. The percentage of loans made in low-income geographies is significantly lower than the percentage of owner-occupied units in these geographies. The percentage of home purchase loans made in moderate-income geographies is significantly lower than the percentage of owner-occupied units in these geographies. The bank's market share in low-income geographies is significantly below its overall market share for home purchase loans. The bank's market share in moderate-income geographies is below its overall market share for home purchase loans.

The geographic distribution of home refinance loans is adequate. The percentage of refinance loans in low-income geographies is somewhat lower than the percentage of owner-occupied units in these geographies. The percentage of home refinances in moderate-income geographies is somewhat lower than the percentage of owner-occupied units in these geographies. The bank's market share of home refinances in low-income geographies is significantly below its overall market share for refinance loans. The bank's market share of home refinance loans in moderate-income geographies is below its overall market share of home refinance loans.

Small Loans to Businesses

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

The overall geographic distribution of small loans to businesses is excellent. This is based on excellent performance in all full-scope AAs in Kansas.

Kansas non-MSA

The geographic distribution of small loans to businesses is excellent. The percentage of small loans to businesses in moderate-income geographies exceeds the percentage of businesses within those geographies. The bank's market share of small loans to businesses in moderate-income geographies significantly exceeds its overall market share.

Topeka MSA

The geographic distribution of small loans to businesses is excellent. The percentage of loans in low-income geographies exceeds the percentage of businesses within these geographies. The percentage of loans in moderate-income geographies significantly exceeds the percentage of businesses within these geographies. The bank's market share in low-income geographies exceeds the percentage of businesses in these geographies. The bank's market share in moderate-income geographies significantly exceeds its overall market share of small loans to businesses.

Wichita MSA

The geographic distribution of small loans to businesses is excellent. The percentage of bank loans in low-income geographies significantly exceeds the percentage of loans in these geographies. The percentage of loans in moderate-income geographies is near to the

percentage of businesses in these geographies. The bank's market share in low-income geographies significantly exceeds its overall market share of small loans to businesses. The bank's market share in moderate-income geographies is below its overall market share of small loans to businesses.

Small Loans to Farms

Refer to Table 7 in the state of Kansas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

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

Kansas non-MSA

The geographic distribution of small loans to farms is excellent. The percentage of small loans to farms in moderate-income geographies is near the percentage of farms in these geographies. The bank's market share in moderate-income geographies exceeds its overall market share. UMB had a 100 percent market share in moderate-income geographies.

Lending Gap Analysis

We reviewed summary reports, maps, analyzed UMB's home mortgage, and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The distribution of borrowers reflects good penetration, based on good mortgage lending to customers of different incomes, adequate lending to businesses of different revenue levels, and good lending to farms of different revenue levels.

Home Mortgage Loans

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

The overall borrower distribution of home mortgage loans is good. In performing our analysis of home mortgage lending, we considered the general affordability of housing to low- and moderate-income borrowers. The relatively high housing costs compared to low-income family income levels somewhat impacts these borrowers' ability to purchase homes in the Wichita MSA.

Kansas non-MSA

The overall borrower distribution of home purchase loans is good. The percentage of loans made to low-income borrowers is somewhat lower than the percentage of low-income families. The percentage of loans made to moderate-income borrowers significantly exceeds the

percentage of moderate-income families in the AA. The bank's market share of home purchase loans to low-income borrowers is significantly below its overall market share of home purchase loans. The bank's market share of home purchase loans to moderate-income borrowers exceeds its overall market share of home purchase loans.

The overall borrower distribution of home improvement loans is good. The percentage of loans made to low-income borrowers significantly exceeds the percentage of low-income families. The percentage of loans made to moderate-income borrowers is lower than the percentage of moderate-income families. The bank's market share of home improvement loans to low-income borrowers significantly exceeds the bank's market share of home improvement loans. The bank's market share of home improvement loans to moderate-income borrowers is significantly below its market share of home improvement loans.

The overall borrower distribution of home mortgage refinance loans is excellent. The percentage of loans made to low-income borrowers is near the percentage of low-income families. The percentage of loans made to moderate-income borrowers exceeds the percentage of moderate-income families. The bank's market share of home mortgage refinance loans to low-income borrowers significantly exceeds its market share of home mortgage refinance loans. The bank's market share of home mortgage refinances to moderate-income borrowers significantly exceeds the bank's market share of home mortgage refinance loans.

Topeka MSA

The overall borrower distribution of home refinance mortgage loans is excellent. The percentage of loans made to low-income borrowers is near the percentage of low-income families. The percentage of home mortgage refinance loans to moderate-income borrowers significantly exceeds the percentage of low-income families. The bank's market share of home mortgage refinance loans to low-income borrowers exceeds its overall market share of home mortgage refinance loans. The bank's market share of home mortgage refinance loans to moderate-income borrowers is below its overall market share of home mortgage refinance loans.

Wichita MSA

The overall borrower distribution of home purchase loans is excellent. The percentage of loans made to low-income borrowers is near the percentage of low-income families. The percentage of loans made to moderate-income borrowers significantly exceeds the percentage of moderate-income borrowers. The bank's market share of home purchase loans to low-income borrowers is equal to its overall market share of home purchase loans. The percentage of home loans to moderate-income borrowers significantly exceeds the percentage of low-income families.

The overall borrower distribution of home mortgage refinance loans is good. The percentage of loans to low-income borrowers is near the percentage of low-income families. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families. The bank's market share of loans to low-income borrowers significantly exceeds its overall market share of home mortgage refinances. The bank's market share of

moderate-income borrowers is significantly below its overall market share of home mortgage refinances.

Small Loans to Businesses

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

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

Kansas non-MSA

The overall borrower distribution of small loans to businesses is good. The percentage of small loans to small businesses (businesses with gross annual revenue of \$1 million or less) was somewhat lower than the percentage of small businesses. The bank's market share of loans to small businesses significantly exceeded its overall market share of loans to small businesses.

Topeka MSA

The overall borrower distribution of small loans to businesses is poor. The percentage of small loans to small businesses (businesses with gross annual revenue of \$1 million or less) was lower than the percentage of small businesses. The bank's market share of loans to small businesses was significantly below its overall market share of loans to small businesses.

Wichita MSA

The overall borrower distribution of small loans to businesses is poor. The percentage of small loans to small businesses (businesses with gross annual revenue of \$1 million or less) was lower than the percentage of small businesses. The bank's market share of small loans to businesses was significantly below its overall market share of loans to small businesses.

Small Loans to Farms

Refer to Table 12 in the state of Kansas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The overall performance in providing small loans to farms is good.

Kansas non-MSA

The borrower distribution of small loans to farms is good. The percentage of small loans to farms (gross annual revenues of \$1 million or less) was somewhat lower than the percentage of small farms. The bank's market share of small loans to farms significantly exceeded its overall market share of loans to farms.

Community Development Lending

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

Kansas non-MSA

The volume of CD lending had a neutral impact on the lending performance in the Kansas non-MSA. During the evaluation period, the bank originated five CD loans totaling \$5.23 million, or 18.53 percent of Tier One Capital allocated to the AA. Some examples of the bank's CD lending include:

- A \$25 thousand loan to a nonprofit organization to support community services to low- and moderate-income individuals or families. The nonprofit is a community health clinic with a purpose to provide free health care to uninsured patients within the AA and surrounding communities.

Topeka MSA

The volume of CD lending had a neutral impact on the lending performance in the Topeka MSA. During the evaluation period, the bank originated two CD loans totaling \$1.7 million, or 6.70 percent of Tier One Capital allocated to the AA.

Wichita MSA

The volume of CD lending had a neutral impact on the lending performance in the Wichita MSA. During the evaluation period, the bank originated 10 CD loans totaling \$19.25 million, or 138.09 percent of Tier One Capital allocated to the AA.

Product Innovation and Flexibility

The bank did not have any products we consider innovative or flexible.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Manhattan MSA and Lawrence MSA is not inconsistent with the bank's overall "High Satisfactory" performance under the lending test in Kansas. Refer to the Tables 1 through 13 in the state of Kansas section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Kansas is rated "Outstanding", when considering performance in all AAs in the state and the greater statewide area. Based on full-scope reviews, the bank's performance in the Wichita and Topeka MSAs are excellent and the Kansas non-MSA is good.

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

Kansas non-MSA

During the evaluation period, UMB made 34 investments and donations in the Kansas non-MSA AA totaling \$1.97 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the AA. The remaining balance on one prior period investment, as of the date of our examination, was approximately \$26 thousand. When considering both current and prior period investments, the total of \$2 million represents 7.10 percent of allocated Tier One Capital for the AA. This level is considered good, when considering the nearly five-year evaluation period. The bank's responsiveness to CD needs in the AA is excellent. In terms of dollar volume, 100 percent of the bank's current period investments were allocated to affordable housing, an identified need in the AA. The bank met this need through three LIHTCs. The LIHTCs totaled \$1.93 million and had a direct and greater impact on the low- and moderate-income people in the AA. In addition, the bank met some of the AAs community service needs through 13 donations totaling over \$6,000.

One investment of note is a \$1 million investment in a LIHTC for increasing the availability of affordable housing for low-income tenants in Great Bend, KS. Great Bend is located in Barton County, which is part of the AA.

Topeka MSA

During the evaluation period, UMB made 36 investments and donations in the Topeka MSA AA totaling \$10.05 million. This dollar amount represents 39.51 percent of allocated Tier One Capital for the AA, and was considered excellent. The bank's responsiveness to CD needs in the AA is adequate. The bank also made five donations totaling over \$10,000 that meet a community service and revitalization and stabilization need.

UMB invested in a \$10 million revenue bond used to refinance debt on a retirement and nursing care facility located in a moderate-income census tract in Topeka, KS. This facility also employs over 170 low- and moderate-income persons. The bank was a leader in issuing this bond and if it were not for the bank this bond would not have been issued.

Wichita MSA

During the evaluation period, UMB made 29 investments and donations in the Wichita MSA AA totaling \$2.37 million. This dollar amount represents 17.06 percent of allocated Tier One Capital for the AA, and was considered excellent. The bank's responsiveness to CD needs in the AA is good. In terms of dollar volume, 26.46 percent of the bank's investments were allocated to affordable housing, an identified need in the AA. They met this need through two MBS and one LIHTC. The LIHTC totaled \$233 thousand and had a direct and greater impact on the low- and moderate-income people in the AA. In addition, the bank made seven

donations totally \$11,000 for community service needs such as food banks, homeless shelters, and free healthcare.

One investment of note is a \$1 million school bond to pay the cost for constructing, furnishing, and equipping new school facilities and making additions and improvements to existing school facilities throughout the district. This bond will upgrade infrastructure in 79 buildings, replace more than 90 percent of the district's portable classrooms, build 19 new multipurpose rooms, upgrade science labs, improve handicap accessibility, rebuild five elementary schools, build new libraries and expand nine other. The district has over 75 percent of students eligible for the free or reduced lunch program.

Investments – Kansas statewide

When considering the investments made in all AAs in the state, and investments in the greater Kansas statewide area, the performance had a positive impact on the overall investment test rating in the state. In addition to the CD investments that benefit the bank's AAs, UMB made three qualifying investments totaling \$1.72 million during the evaluation period in the broader statewide area. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the greater Kansas statewide area. The remaining balance on five prior period investments, as of the date of our examination, was \$860 thousand. When considering these investments and all other investments in the full- and limited-scope areas, the total dollar amount of \$17.49 million represented 22.95 percent of the allocated Tier One Capital in the state.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Manhattan MSA is weaker than the bank's overall "Outstanding" performance in the state of Kansas, due to a lower level of investments. The bank's performance in the Lawrence MSA is also weaker than the bank's overall performance in the state of Kansas due to a lower level of investments. However, this did not affect the overall rating, because we also considered the broader regional area investment, which included a \$521 thousand small business loan made in the Lawrence MSA AA. Refer to the Table 14 in the state of Kansas section of appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Kansas is rated "Low Satisfactory". Based on full-scope reviews, the bank's performance in the Kansas non-MSA is good, and in the Topeka MSA and Wichita MSA is adequate.

Retail Banking Services

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

Kansas non-MSA

UMB's branch distribution in the AA is excellent. Branches are readily accessible to geographies and individuals of different income levels. There are no low-income census tracts in the AA. The bank has one branch in a moderate-income tract, where 10 percent of the population resides. The percentage of branches in the moderate-income tracts exceeds the percentage of populations residing in those tracts.

The bank's process for opening and closing branches has positively affected the accessibility of the bank's delivery systems to low- and moderate-income geographies or individuals. Due to the increased use of alternative delivery systems, branch and teller transactions have declined. The change in customers' behavior in using alternative delivery systems has led to some branch closures. To maintain branches located in low- and moderate-income areas, efforts were made to cross-train employees to meet customer needs. As a result, this branch model enables the bank to retain branches, mitigate costs, and utilize branch employees with a diverse skill set to meet customer needs. This model was applied to one branch within a moderate-income tract. The bank opened five branches and closed one branch. This branch was sold and included the building, deposits, and loans. Of the branches that were opened, one was located in a moderate-income geography.

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

Management compliments its traditional service delivery methods with certain delivery processes, including online banking, mobile banking, ATMs with Spanish and English languages, and telephone banking. UMB also uses a telephone service to assist with translation efforts at the call center and branch locations as needed. These delivery methods provide increased access to banking services throughout all areas in the AA. Government check cashing is available to all accountholders for Federal Social Security, Supplemental Security Income, and State checks. Non-accountholders may cash government checks up to \$1,000. The fee for cashing government checks is waived at two branches in rural areas. Refer to the Description of Institution section of this document for detail regarding UMBs other alternative delivery systems.

Topeka MSA

UMB's branch distribution in the Topeka MSA is adequate. Branches are reasonably accessible to geographies and individuals of different income levels. UMB has no branches in the low-income geographies in this MSA, where nearly 11 percent of the population resides. The bank has one branch in a moderate-income tract, where nearly 23 percent of the population resides. The percentage of UMB's branches in the moderate-income geographies exceeded the percentage of population living in these geographies.

Branch openings and closing have generally not affected the accessibility of the bank's delivery systems to low- and moderate-income geographies or individuals. Due to the increased use of alternative delivery systems, branch and teller transactions have declined. The change in customers' behavior in using these alternatives has led to some branch

closures. To maintain branches located in low- and moderate-income geographies, efforts were made to cross-train employees to meet customer needs. As a result, this branch model retain branches, mitigates costs, and utilizes branch employees with a diverse skill set to meet customer needs. This model was applied to one branch located within a moderate-income tract. The bank closed one branch, which was in a middle-income tract. For the one closed branch, a full service UMB branch is located within seven miles. The bank did not open any branches in the Topeka MSA during the evaluation period.

UMB's hours and services offered throughout the AA do not vary in a way that inconvenience portions of the AA, particularly low- and moderate-income geographies or individuals. Services offered and hours of operation are comparable among locations. Refer to the Description of Institution section of this document for detail regarding UMBs other alternative delivery systems.

Wichita MSA

UMB's branch distribution in the Wichita MSA is poor. Branches are reasonably accessible to limited geographies and individuals of different income levels. UMB has one branch in a low-income geography where nearly eight percent of the population resides. The percentage of UMB branches in the low-income geography exceeded the percentage of population living in the low-income tract. The bank has no branches in moderate-income tracts, where nearly 31 percent of the population resides.

Branch openings and closing have generally not affected the accessibility of the bank's delivery systems to low- and moderate-income geographies or individuals. Due to the increased use of alternative delivery systems, branch and teller transactions have declined. The change in customers' behavior in using these alternatives has led to some branch closures. To maintain branches located in low- and moderate-income geographies, efforts were made to cross-train employees to meet customer needs. As a result, this branch model retain branches, mitigates costs, and utilizes branch employees with a diverse skill set to meet customer needs. This model was applied to one branch located within a low-income tract. UMB closed one branch in a moderate-income tract. Loans and deposits were consolidated at a branch that is located within 10 miles. The bank did not open any branches in the Wichita MSA during the evaluation period.

UMB's hours and services offered throughout the MSA do not vary in a way that inconvenience portions of the MSA, particularly low- and moderate-income geographies or individuals. Services offered and hours of operation are comparable among locations.

Community Development Services

Kansas non-MSA

UMB provided an adequate level of community development services in the KS non-MSA. UMB staff provided their expertise to six different organizations, which included six leadership positions that promoted community development initiatives in the AA. Throughout the evaluation period, six bank employees volunteered their time for a total of 125 hours. Some examples of services provided by bank employees include:

- One employee provided a leadership position for OCCK, Inc., an organization that offers affordable housing and career readiness services to low- and moderate-income individuals with physical or mental disabilities.
- One employee served on the board for an organization that offers social services, emergency assistance and housing to low- to moderate-income families in Dickinson County, Kansas. This employee provides financial input, but also cleaning and upkeep for the HOPE Center, which provides housing for those in need up to 90 days.

Topeka MSA

UMB provided an adequate level of community development services in the Topeka MSA. UMB staff provided their expertise to three organizations, which included two leadership positions that promoted community development initiatives within the MSA. Throughout the evaluation period, three employees volunteered their time for a total of 88 hours. Some examples of services provided by bank employees include:

- An employee provided a leadership position for Saint Francis Health, an organization that provides health needs to low- and moderate-income communities.
- An employee provided 18 hours of financial literacy through the Junior Achievement program. This education was provided at a school in a moderate-income tract where 91 percent of the students are eligible for free or reduced priced lunch programs.

Wichita MSA

UMB provided a good level of community development services in the Wichita MSA. UMB staff provided their expertise to seven organizations, which included nine leadership positions that promoted community development initiatives within the MSA. Throughout the evaluation period, seven employees volunteered their time for a total of 224 hours. Some examples of services provided by bank employees include:

- One employee served in a leadership role for the Habitat of Humanity organization that provides affordable housing. The associate reviewed and approved budgets and loans for low- and moderate-income families seeking affordable housing.
- Two employees served in a leadership role for the Wichita Children's Home. This entity provides social services for low- and moderate-income individuals that include emergency shelter.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Lawrence MSA is weaker than the bank's overall "High Satisfactory" performance in the state and is considered adequate. The bank's performance in the Manhattan MSA is stronger than the bank's overall performance in the state and is considered excellent. In both cases, this performance was due to branch distribution. Combined performance in the limited-scope AAs

does not impact the overall conclusions. Refer to Table 15 in the state of Kansas section of appendix D for the facts and data that support these conclusions.

State Rating

State of Missouri

CRA Rating for Missouri⁶:	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:

- An adequate level of lending for home mortgage loans and small loans to businesses;
- Overall, the geographic distribution of the bank’s lending is good, based on good home mortgage and small business performance;
- Overall poor borrower distribution, as evidenced by adequate home mortgage performance and poor small loans to small businesses performance;
- Overall excellent investment performance, when considering performance in all Missouri AAs and the broader statewide area;
- Investments were responsive to community needs;
- Delivery systems are reasonable accessible to low- and moderate-income individuals; and
- Bank personnel provided an adequate level of community development services during the evaluation period.

Description of Institution’s Operations in Missouri

UMB operates 19 branches and 31 ATMs in eight Missouri AAs. As of June 30, 2016 UMB had \$848.12 million in deposits in Missouri, which is 5.39 percent of bank deposits. The top five banks in terms of deposit market share in Missouri are U.S. Bank, N.A., Commerce Bank, Great Southern Bank, The Central Trust Bank, and Central Bank of Boone County. The top

⁶ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution’s performance in that area.

five banks have a combined market share of 21.61 percent. UMB had an overall deposit market share of 1.63 percent in the state of Missouri. UMB CRA reportable loan originations in Missouri accounted for 17.88 percent of UMB's total.

Refer to the market profiles for the state of Missouri in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Missouri

For the state of Missouri, we completed a full-scope review of the Joplin MSA, Missouri non-MSA, and Springfield MSA. We completed a limited-scope review of Columbia MSA, Jefferson City MSA, and St. Joseph MSA. The Joplin MSA, Missouri non-MSA and Springfield MSA received full-scope reviews due to the high percentage of deposits in the areas (15.98 percent, 43.05 percent, and 17.06 percent, respectively). The Missouri non-MSA AA also had the largest volume of reportable loans in the state with 54 percent, while Springfield and Joplin MSAs had reportable loans in the state of 13.66 percent and 9.55 percent, respectively. Ratings are based primarily on results of the full-scope areas. The Missouri non-MSA AA received the most weight on final ratings because this AA had the largest percent of the bank's deposits, loans, and branches in Missouri. For the Joplin MSA the bank did not originate or purchase a sufficient volume of home improvement loans during the evaluation period to perform a meaningful analysis. For the Springfield MSA the bank did not originate or purchase a sufficient volume of home improvement or farm loans during the evaluation period to perform a meaningful analysis. Refer to the tables in appendix A for more information on the Missouri AAs.

We performed one community contact with an economic development organization in the Joplin AA. The contact identified credit needs of mortgages, home improvement loans, and small business financing and grants, particularly for startup businesses.

In the Missouri non-MSA, the community contacts identified access to credit, financial literacy seminars targeted at low- and moderate-income individuals in the AA, and affordable housing. The community contacts further stated innovative and flexible products are needed to help accommodate some low- and moderate-income individuals. Lastly, additional capital for small business start-ups is needed. There are opportunities for financial institutions' involvement in addressing the aforementioned community needs, within this area; however, given the number of banks serving the AA, competition for community activities is strong.

We performed three community contacts in the Springfield MSA. Contacts included an economic development organization, an affordable housing organization, and an agricultural business education organization. Identified credit needs include low-income rental housing, small dollar loan programs as an alternative to payday lenders, and loans to young farmers. Other community needs include financial literacy education for low- and moderate-income individuals.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN Missouri

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Missouri is rated "Low Satisfactory". Based on full-scope reviews, the bank's performance in the Joplin MSA, Missouri non-MSA, and Springfield MSA is adequate. In performing our analysis, we placed greater weight on the bank's small business and small farm loan performance, as it represented the majority of the bank's CRA reportable lending activity. Additionally, for the geographic distribution and borrower income distribution analysis, we placed greater weight on the bank's performance in the Missouri non-MSA as it represents the largest percentage of the bank's deposits, loans, and branches in the state of Missouri.

Lending Activity

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

The bank's overall lending activity in the state of Missouri is adequate, considering the strong competition for all types of loans in the Joplin MSA, Missouri non-MSA, and Springfield MSA AAs.

Joplin MSA

UMB's lending activity in the Joplin MSA is adequate, when considering the bank's business strategy and loan competition. Home mortgage lending activity is good and both small business and small farm lending are adequate considering competition in the AA. Greater weight was placed on home mortgage and small business lending given the volume of loans reported.

Based upon FDIC Deposit Market Share data as of June 30, 2016, UMB has a 5.10 percent market share of deposits, ranking 8th among 14 financial institutions in the AA, and putting them in the top 57.14 percent of total depository banks. Based upon 2015 Peer Mortgage Data, UMB had a market share of 0.13 percent for home purchase loans, ranking 60th among 147 reporting lenders, which is equivalent to being in the top 40.82 percent of lenders. In addition, the top five home purchase lenders had 37.59 percent of the total market share. For home refinance loans, the bank ranked 22nd among 126 lenders with a 1.08 percent market share, which is equivalent to being in the top 17.50 percent of lenders. For home refinance loans, the top five lenders collectively had 38.67 percent of the total market share. For home improvement loans, the bank ranked 17th out of 44 reporting lenders with a 1.04 percent market share, which is equivalent to being in the top 38.64 percent of lenders. The top five lenders collectively had 65.74 percent of the total market share for home improvement loans. These market ranks/shares are adequate when compared to the deposit market rank/share and competition within the AA. Additionally, the bank's primary business strategy as a business lender factored into this conclusion.

UMB had a 1.62 percent market share of small loans to businesses, ranking 14th among 37 reporting lenders, or in the top 26.40 percent of lenders. The small business lending activity is adequate given the bank's market share and ranking when compared to the deposit market

share and small business lending competition within the AA. The top five lenders for small business lending collectively had 67.18 percent of the market share, and includes four of the nation's largest credit card lenders.

UMB's small farm lending activity is adequate. The bank had a 4.05 percent market share for lending to small farms, ranking them 4th out of 15 reporting lenders, or the top 26.67 percent of lenders. The top lender for small farms had 60.36 percent of the market share, with the other top lenders ranging between 3.15 percent and 12.16 percent.

Missouri non-MSA

UMB's lending activity in the Missouri non-MSA is adequate, when considering the bank's business strategy and loan competition. Home mortgage lending activity is good, and both small business and small farm lending activity are adequate.

Based upon FDIC Deposit Market Share data as of June 30, 2016, UMB had a 9 percent market share of deposits, ranking 1st among 46 financial institutions in the AA, and putting them in the top one percent of total depository banks. Based upon 2015 Peer Mortgage Data, UMB had a 0.74 percent market share of home purchase loans, ranking 33rd out of 232 reporting lenders, which is equivalent to being in the top 14.22 percent of lenders. In addition, the top five home purchase lenders had 27.61 percent of the total market share. The bank had a 2.49 percent market share of home improvement loans, ranking them 9th among 79 reporting lenders, which is equivalent to being in the top 16.46 percent of lenders. The top five home improvement lenders had 35.73 percent of total market share. The bank achieved a 2.53 percent market share of home refinance loans, ranking them 6th among 215 reporting lenders, which is equivalent to being in the top 2.80 percent of lenders. For home refinance loans, the top five lenders collectively had 29.99 percent of the total market share. Given the competition from the other reporting lenders in the AA and the bank's lender rankings for each product, overall home mortgage lending activity is good. Additionally, the bank's primary business strategy as a business lender factored into this conclusion.

UMB had a 1.72 percent market share of small loans to businesses, ranking 15th out of 56 reporting lenders, or the top 23.80 percent of lenders. The small business lending activity is adequate given the bank's market share and ranking when compared to the deposit market share and small business lending competition within the AA. The top five lenders for small business lending include four of the nation's largest credit card lenders, which collectively had 55.97 percent of the market share.

UMB's small farm lending activity is good. The bank achieved a 9.77 percent market share for lending to small farms, ranking 3rd among 146 reporting lenders, or the top 9.09 percent of lenders. The top five lenders for small farms collectively had 65.02 percent of the market share.

Springfield MSA

UMB's lending activity in the Springfield MSA is adequate, when considering the bank's business strategy and loan competition. Home mortgage lending activity is good and small business lending is adequate considering competition in the AA. The bank did not originate a

sufficient volume of small loans to farms during the evaluation period to perform meaningful analysis.

Based upon FDIC Deposit Market Share data as of June 30, 2016, UMB had a 1.82 percent market share of deposits, ranking 15th among 34 financial institutions in the AA. Based upon 2015 Peer Mortgage Data, UMB had a market share of 0.17 percent for home purchase loans, ranking them 70th out of 240 reporting lenders, which is equivalent to being in the top 29.17 percent of lenders. The top five home purchase lenders had 28.57 percent of the total market share. For home refinance loans, the bank ranked 67th out of 193 lenders with a 0.23 percent market share, which is equivalent to being in the top 34.70 percent of lenders. For home refinance loans, the top five lenders collectively had 30.45 percent of the total market share. These market ranks/shares are adequate when compared to the deposit market rank/share and competition within the AA.

UMB had a 0.96 percent market share of small loans to businesses, ranking 19th out of 71 reporting lenders, or the top 26.80 percent of lenders. The top five lenders for small business lending include four of the nation's largest credit card lenders, which collectively had 54.73 percent of the market share. Performance for small business lending activity is adequate.

Distribution of Loans by Income Level of the Geography

Overall, the geographic distribution of the bank's lending is good. The geographic distribution of home loans is good. The geographic distribution of small business loans is good. Small farm geographic distribution of loans is adequate. The Missouri non-MSA AA received the most weight on final ratings because this AA had the largest percentage of the bank's deposits, loans, and branches in Missouri.

Home Mortgage Loans

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

Overall, the geographic distribution of home mortgage loans is good. Consideration was given to the limited opportunities for home mortgage loans in the low- and moderate-income geographies in the Joplin MSA and Springfield MSA.

Joplin MSA

Overall, the geographic distribution of home mortgage loans is excellent. According to the 2010 U.S. Census data, no low-income census tracts exist in the AA. Moderate-income census tracts represent 14.71 percent of the AA's geographies. In evaluating the geographic distribution of home loans in the Joplin MSA AA, it is important to note that according to 2010 U.S. Census data, moderate-income tracts contained 43.82 percent of the total owner-occupied housing units in the AA. Of the total housing units in moderate-income geographies (per 2010 Census data), rental and vacant units account for 41.28 percent and 14.89 percent, respectively. These factors were considered when determining the conclusions on geographic distribution of home mortgage loans.

The overall geographic distribution of home purchase loans is good. The percentage of loans in moderate-income geographies exceeded the percentage of owner-occupied units in these tracts. The bank's market share in the moderate-income census tracts was significantly below its overall market share for home purchase loans.

The overall geographic distribution of home refinance loans is excellent. The percentage of loans in moderate-income geographies exceeded the percentage of owner-occupied units in these tracts. The bank's market share in moderate-income census tracts exceeded its overall market share for home refinance.

Missouri non-MSA

Overall, the geographic distribution of home mortgage loans is good. Per 2010 U.S. Census data, no low-income census tracts exist in the AA. Moderate-income census tracts represent 8.47 percent of the AA's geographies. In evaluating the geographic distribution of home loans in the Missouri non-MSA AA, it is important to note that according to 2010 U.S. Census data, moderate-income census tracts contained 56.48 percent (3,650 units) of the total owner-occupied housing units in the AA. Of the total housing units in moderate-income geographies (per 2010 Census data), rental and vacant units account for 29 percent and 14.53 percent,

respectively. Greater emphasis was placed on performance for refinance loans given the volume of loans originated compared to purchase and home improvement loans.

The geographic distribution of home purchase loans is good. The percentage of loans made in moderate-income geographies was near the percentage of owner-occupied units in these geographies. The bank's market share in moderate-income census tracts exceeds its overall market share for home purchase loans.

The geographic distribution of home improvement loans is excellent. The percentage of loans in moderate-income geographies exceeded the percentage of owner-occupied units in these geographies. The bank's market share in moderate-income census tracts significantly exceeds its overall market share for home improvement loans.

The geographic distribution of home refinance loans is adequate. The percentage of loans made in moderate-income census tracts was below the percentage of owner-occupied units in these geographies. The bank's market share in moderate-income census tracts was significantly below its overall market share for home refinance loans.

Springfield MSA

Overall, the geographic distribution of home mortgage loans is adequate. Low-income census tracts represent 3.95 percent of the AA's geographies. In evaluating the geographic distribution of home loans in the Springfield MSA it is important to note that, according to 2010 U.S. Census data, low-income census tracts contained 13.07 percent (563 units) of the total owner-occupied housing units in the AA. Of the total housing units in low-income geographies (per 2010 Census data), rental and vacant units account for 69.71 percent and 17.22 percent, respectively. Based on these statistics, the bank had limited opportunities for home mortgage lending in low-income census tracts. As such, greater emphasis was placed on the bank's performance in moderate-income geographies when determining the overall geographic distribution conclusion for home mortgage loans.

The geographic distribution of home purchase loans is adequate. The percentages of loans in both low- and moderate-income geographies were significantly below the percentage of owner-occupied units in these tracts. The bank's market share in the low-income census tracts was significantly below its overall market share for home purchase loans. The bank's market share in the moderate-income census tracts exceeded its overall market share for home purchase loans. Greater weight was given to performance in the moderate-income census tracts for the conclusion on home purchase lending given the limited opportunity for home mortgage lending in low-income census tracts. There is also very strong competition for home purchase loans in the AA.

The geographic distribution of home refinance loans is poor. The percentage of loans in low- and moderate-income geographies were significantly below the percentage of owner-occupied units in these tracts. The bank's market share in low- and moderate-income census tracts was significantly below its overall market share for home refinance loans. Very strong competition for home refinance loans in the AA was considered in concluding on the bank's performance. Although the bank's performance is consistent with a very poor conclusion, we concluded the performance is poor because of the strong competition.

Small Loans to Businesses

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

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

Joplin MSA

The geographic distribution of small loans to businesses is excellent. There were no low-income census tracts in this AA. The percentage of loans made in moderate-income geographies significantly exceeded the percentage of businesses in those geographies. The bank's market share in moderate-income census tracts significantly exceeded its overall small loans to businesses market share.

Missouri non-MSA

The overall geographic distribution of small loans to businesses is adequate. There were no low-income census tracts in this AA. The percentage of loans made in moderate-income geographies was below the percentage of businesses in those geographies. The bank's market share in moderate-income geographies substantially meets its overall market share for small loans to businesses.

Springfield MSA

The geographic distribution of small loans to businesses is good. The percentage of loans in low-income geographies was below the percentage of businesses in those geographies. The percentage of loans made in moderate-income geographies exceeded the percentage of businesses in those geographies. The bank's market share in low-income census tracts was significantly below its overall small loans to businesses market share. The bank's market share in moderate-income census tracts exceeded its overall small loans to businesses market share. Less than one percent of small businesses are located in the low-income census tracts.

Small Loans to Farms

Refer to Table 7 in the state of Missouri section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

Overall, the geographic distribution of small loans to farms is adequate. Consideration was given to the limited opportunities for farm loans in the moderate-income census tracts in the Joplin MSA and Missouri non-MSA.

Joplin MSA

The overall geographic distribution of small loans to farms is good, when considering the very limited opportunities for the bank to make small loans to farms in low- and moderate-income geographies. According to 2010 Census data, there were only 19 farms in moderate-income geographies. There were no low-income census tracts in this AA. The percentage of small

loans to farms made in moderate-income geographies significantly exceeded the percentage of farms in those geographies. The bank's market share in moderate-income geographies was significantly below its overall market share for small loans to farms.

Missouri non-MSA

Lending Gap Analysis

We reviewed summary reports, maps, analyzed UMB's home mortgage, and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans by Income level of borrower is poor. The borrower distribution of home mortgage loans to borrowers of different income levels is good. The distribution of reported loans to small businesses and small farms is adequate. The Missouri non-MSA AA received the most weight on final ratings because this AA had the largest percent of the bank's deposits, loans, and branches in Missouri.

Home Mortgage Loans

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

The overall borrower distribution of home mortgage loans is adequate. In performing our analysis of home mortgage lending, we considered the general affordability of housing to low- and moderate-income borrowers. The relatively high housing costs compared to low-income family income levels somewhat impacts these borrowers' ability to purchase homes in the Missouri non-MSA and Springfield MSA.

Joplin MSA

The overall borrower distribution of home purchase loans is poor. The percentage of loans to low-income borrowers was significantly below the percentage of low-income families. The percentage of loans made to moderate-income borrowers was near the percentage of moderate-income families. The bank's market share of loans to both low-income and moderate-income borrowers was significantly below its overall market share of home purchase loans.

The overall borrower distribution of home refinance loans is poor. The percentage of loans to low-income borrowers was significantly below the percentage of low-income families. The percentage of loans to moderate-income borrowers was significantly below the percentage of moderate-income borrowers. The bank's market share of loans to low-income borrowers substantially meets the overall market share of refinance loans. The bank's market share of loans to moderate-income borrowers was below the overall market share of refinance loans.

Missouri non-MSA

The overall borrower distribution of home purchase loans is adequate. The percentage of loans to low-income borrowers was significantly below the percentage of low-income families. The percentage of loans made to moderate-income borrowers significantly exceeded the percentage of moderate-income families. The bank's market share of loans to low-income borrowers was significantly below its overall market share of home purchase loans. The bank's market share of loans to moderate-income borrowers exceeded its overall market share of home purchase loans.

The overall borrower distribution of home improvement loans is adequate. The percentage of loans to low-income borrowers was significantly below the percentage of low-income families. The percentage of loans made to moderate-income borrowers significantly exceeded the percentage of moderate-income families. The bank's market share of loans to low-income borrowers was significantly below its overall market share of home improvement loans. The bank's market shares of loans to moderate-income borrowers significantly exceeded its overall market share of home improvement loans.

The overall borrower distribution of home refinance loans is poor. The percentage of loans to low-income borrowers was below the percentage of low-income families. The percentage of loans to moderate-income borrowers was significantly below the percentage of moderate-income families. The bank's market share of loans to low-income borrowers substantially meets the overall market share of refinance loans. The bank's market share of loans to moderate-income borrowers was below the overall market share of refinance loans.

Springfield MSA

The overall borrower distribution of home purchase loans is good. The percentage of loans to low-income borrowers was below the percentage of low-income families. The percentage of loans made to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share of loans to low-income meets its overall market share of home purchase loans. The market share of loans to moderate-income borrowers was substantially below its overall market share of home purchase loans.

The overall borrower distribution of home refinance loans is poor. The percentage of loans to low-income borrowers was significantly below the percentage of low-income families. The percentage of loans made to moderate-income borrowers was significantly below the percentage of moderate-income families. The bank's market share of loans to both low- and moderate-income borrowers was significantly below the overall market share of refinance loans.

Small Loans to Businesses

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

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

Joplin MSA

The borrower distribution of small loans to businesses is poor. The percentage of small loans to small businesses (businesses with gross annual revenue of \$1 million or less) was below the percentage of small businesses. The bank's market share of loans to small businesses was below its overall market share of loans to small businesses.

Missouri non-MSA

The borrower distribution of small loans to businesses is adequate. The percentage of small loans to small businesses (businesses with gross annual revenue of \$1 million or less) was significantly below the percentage of small businesses. The bank's market share of loans to small businesses exceeds its overall market share of loans to small businesses.

Springfield MSA

The borrower distribution of small loans to businesses is poor. The percentage of small loans to small businesses (businesses with gross annual revenue of \$1 million or less) was significantly below the percentage of small businesses. The bank's market share of loans to small businesses was significantly below its overall market share of loans to small businesses.

Small Loans to Farms

Refer to Table 12 in the state of Missouri section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

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

Joplin MSA

The borrower distribution of small loans to farms is adequate. The percentage of small loans to small farms (farms with gross annual revenue of \$1 million or less) was below the percentage of small farms. The bank's market share of loans to small farms was below its overall market share of loans of small farms.

Missouri non-MSA

The overall borrower distribution of small loans to farms is adequate. The percentage of small loans to small farms (farms with gross annual revenue of \$1 million or less) was significantly below the percentage of small farms. The bank's market share of loans to small farms substantially meets its overall market share of loans to small farms.

Community Development Lending

Refer to Table 1 Lending Volume in the state of Missouri section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition,

Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

Joplin MSA

The volume of CD lending had a neutral impact on the lending performance in the Joplin MSA during the evaluation period. UMB made one loan for \$7 million.

Missouri non-MSA

The volume of CD lending had a neutral impact on the lending performance in the non-Missouri MSA. During the evaluation period, the bank originated two CD loans totaling \$2.95 million. A specific example is a construction loan for \$703 thousand for an addition to a manufacturing facility, which supports the creation and retention of jobs for low- and moderate-income individuals within the AA.

Springfield MSA

The volume of CD lending had a neutral impact on the lending performance in the Springfield MSA. During the evaluation period, the bank originated five CD loans totaling \$28.73 million, or 193.89 percent of Tier One Capital allocated to the AA.

Product Innovation and Flexibility

The bank does not have any products we consider innovative or flexible.

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 is not inconsistent with the bank's overall "Low Satisfactory" performance under the lending test in Missouri. In the St. Joseph MSA, the bank's performance is stronger than the bank's overall performance in the state of Missouri. The performance in the St. Joseph MSA had a neutral impact on the overall rating. The stronger performance is due to excellent geographical distribution of small business loans. Refer to the Tables 1 through 13 in the state of (name of state) section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Missouri is rated "Outstanding", when considering performance in all AAs in the state and the greater statewide area. Based on full-scope reviews, the bank's performance in the Joplin MSA is excellent, the Springfield MSA is good, and the Missouri non-MSA is good.

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

Joplin MSA

During the evaluation period, UMB made 28 investments and donations in the Joplin MSA totaling \$1.88 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the AA. The remaining balance on two prior period investments, as of the date of our examination, was \$1.08 million. When considering both current and prior period investments, the total of \$2.94 million represents 21.16 percent of allocated Tier One Capital for the AA. This level is considered excellent, when considering the nearly five-year evaluation period. The bank's responsiveness to CD needs in the AA is adequate. In terms of dollar volume, 21.16 percent of the bank's current period investments were allocated to affordable housing. The bank responded to this need through the purchase of four MBS. In addition, the bank responded to community service needs with eight donations totaling less than \$4,000.

UMB underwrote, and subsequently purchased, three school bonds totaling \$1.45 million. Two of the school bonds were for the acquisition of property and new construction of a junior high building located in a school district where over 50 percent of students are on the free or reduced lunch program. The other bond is to complete safety and security upgrades including, security cameras, exterior door replacements, updating fire alarm systems, and replacing roofing, windows and flooring. While all schools in the district have over 50 percent of students on the free or reduced lunch program, these improvements specifically targeted schools with nearly 75 percent of students on the free or reduced lunch program.

Missouri non-MSA

During the evaluation period, UMB made 39 investments and donations in the Missouri non-MSA totaling \$2.44 million. This dollar amount represents 6.53 percent of allocated Tier One Capital for the AA, and was considered good, when considering the nearly five-year evaluation period. The bank's responsiveness to CD needs in the AA is excellent. In terms of dollar volume, 50.33 percent of the bank's current period investments were allocated to affordable housing and revitalization/stabilization, identified needs in the AA. The bank met this need through seven MBS and three school bonds in an underserved or distressed middle-income census tract. In addition, they met multiple community service needs such as free/affordable healthcare and access to food through 15 donations totaling over \$25,000. We deemed this to be excellent responsiveness given the limited opportunity of direct impact investments such as LIHTC.

UMB purchased six school bonds totaling \$1.54 million in the AA. The school bonds had various purposes including constructing, improving, furnishing and equipping school facilities at a school with nearly 80 percent of students on the free or reduced lunch program. In addition, one bond was used to bring existing facilities into compliance with the Americans with Disabilities Act. The school has nearly 90 percent of students on the free or reduced lunch program and is located in an underserved or distressed middle-income tract.

Springfield MSA

During the evaluation period, UMB made 19 investments and donations in the Springfield MSA totaling \$907 thousand. This dollar amount represents 6.12 percent of allocated Tier One

Capital for the AA, and was considered good. The bank's responsiveness to CD needs in the AA is good. Affordable housing was identified as a need through the community contact. The bank met this need through two MBS and one LIHTC totaling \$846 thousand, which is 100 percent of the investments made in the AA.

Investments – Missouri statewide

When considering the investments made in all AAs in the state, along with investments in the greater Missouri statewide area, this performance had a significantly positive impact on the overall investment test rating. In addition to the CD investments that benefit the bank's AAs, UMB made 49 qualifying investments totaling \$15.73 million during the evaluation period in the broader statewide area. When considering these investments along with all other investments in the full- and limited-scope areas, the total dollar amount of \$24.11 million represented 27.75 percent of the allocated Tier One Capital in the state of Missouri. The statewide investments contributed to the "Outstanding" rating.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Columbia MSA and the St. Joseph MSA are not inconsistent with the bank's overall "Outstanding" performance in the state of Missouri, due to similar levels of investments. The bank's performance in the Jefferson City MSA is good, but weaker than the bank's overall performance in the state of Missouri due to lower levels of investments. Refer to the Table 14 in the state of Missouri section of appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Missouri is rated "Low Satisfactory". Based on full-scope reviews, the bank's performance in the Joplin MSA is good, in the Missouri non-MSA is adequate, and in the Springfield MSA is good.

Retail Banking Services

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

Joplin MSA

UMB's branch distribution in the Joplin MSA is excellent. Branches are readily accessible to geographies and individuals of different income levels. There are no low-income geographies in this AA. The bank has one branch in moderate-income tract, where nearly 13 percent of the population resides. The percentage of UMB's branches in the moderate-income geographies exceeded the percentage of population living in these geographies.

Branch openings and closing have generally not affected the accessibility of the bank's delivery systems to low- and moderate-income geographies or individuals. Due to the increased use of alternative delivery systems by the bank's customers, branch and teller transactions have declined. The change in customers' behavior in using these alternative delivery systems led to some branch closures. To maintain branches located in low- and moderate-income geographies, efforts were made to cross-train employees to meet customer needs. As a result, this branch model enables the bank to retain branches in low- and moderate-income areas by mitigating costs and utilizing branch employees with a diverse skill set to meet customer needs. This model was applied to one branch located within a moderate-income tract. The bank closed two branches. Both closed branches were in middle-income tracts. For one closed branch, a full service UMB branch is located within three miles. The bank did not open any branches in the Joplin MSA during the evaluation period.

UMB's hours and services offered throughout the AA do not vary in a way that inconvenience portions of the AA, particularly low- and moderate-income geographies or individuals. Services offered and hours of operation are comparable among locations. Refer to the Description of Institution section of this document for detail regarding UMBs other alternative delivery systems. Refer to the Description of Institution section of this document for detail regarding UMBs other alternative delivery systems.

Missouri non-MSA

UMB's branch distribution in the AA is poor. Branches are accessible to limited portions of the bank's AA. There are no low-income geographies in this AA. The bank has no branches in moderate-income tracts, where nearly six percent of the population resides. All 10 branches are in middle-income tracts in the AA. The percentage of UMB's branches in the moderate-income geographies is below the percentage of population living in these geographies.

Branch openings and closing have generally not affected the accessibility of the bank's delivery systems to low- and moderate-income geographies or individuals. The bank closed two branches. Both closed branches were in middle-income tracts. For one closed branch, a full service UMB branch is located within one mile. The other branch was closed based on a utilization analysis and determination that it was not a profitable branch location. There are several other competing bank branches in the area.

UMB's hours and services offered throughout the AA do not vary in a way that inconvenience portions of the AA, particularly low- and moderate-income geographies or individuals. Services offered and hours of operation are comparable among locations. Refer to the Description of Institution section of this document for detail regarding UMBs other alternative delivery systems.

Springfield MSA

UMB's branch distribution in the Springfield MSA is good. Branches are accessible to geographies and individuals of different income levels. UMB has no branches in low-income geographies in this MSA where three percent of the population resides. The bank has three branches in moderate-income tracts, where 18 percent of the population resides. The percentage of UMB's branches in the moderate-income geographies exceeds the percentage

of population living in these geographies. The bank did not open or close any branches in the Springfield MSA during the evaluation period.

UMB's hours and services offered throughout the MSA do not vary in a way that inconvenience portions of the MSA, particularly low- and moderate-income geographies or individuals. Services offered and hours of operation are comparable among locations.

Community Development Services

Joplin MSA

UMB provided an adequate level of community development services in the Joplin MSA. UMB staff provided their expertise to two organizations, which included two leadership positions that promoted community development initiatives within the MSA. Throughout the evaluation period, three employees volunteered their time for a total of 42 hours. Examples of some services provided by employees include:

- An employee provided 20 hours of technical assistance as a board member to the local United Way. As a board member, actions included reviewing and approving budgets, which represent a financial service to an organization that serves low- and moderate-income individuals and families.
- UMB provided services as a co-manager and shared in a portion of the underwriting responsibility and liability with senior firms for the Missouri Housing Development Commission (MHDC) bonds. MHDC provides a down payment assistance mortgage product across the state of Missouri. The product is targeted to low- and moderate-income borrowers and geographies. UMB is one of the entities selected by MHDC to securitize, market, and sell the bonds.

Missouri non-MSA

UMB provided an adequate level of community development services in the Missouri non-MSA. UMB staff provided their expertise to seven different organizations, which included six leadership positions that promoted community development initiatives in the AA. Throughout the evaluation period, six bank employees volunteered their time for a total of 117 hours. Examples of some services provided by employees include:

- One employee provided assistance to Habitat for Humanity and coordinated a volunteer day for branch employees to participate in the building of a local home. Habitat for Humanity provides affordable housing.
- UMB provided services as a co-manager and shared in portion of the underwriting responsibility and liability with senior firms for MHDC bonds. MHDC provides a down payment assistance mortgage product across the state of Missouri. The product is targeted to low- and moderate-income borrowers and geographies. UMB is one of the entities selected by MHDC to securitize, market, and sell the bonds.

Springfield MSA

UMB provided an adequate level of community development services in the Springfield MSA. UMB staff provided their expertise to five organizations, which included four leadership positions that promoted community development initiatives within the MSA. Throughout the evaluation period, 10 employees volunteered their time for a total of 129 hours. Some examples of services performed by employees include:

- Two employees served as President of the Springfield Finance and Development Corporation during the evaluation period. These employees provided 60 hours of technical assistance. This economic development entity provides bridge loans or other short term financing to attract new businesses to the city.
- UMB provided services as a co-manager and shared in portion of the underwriting responsibility and liability with senior firms for MHDC bonds. MHDC provides a down payment assistance mortgage product across the state of Missouri. The product is targeted to low- and moderate-income borrowers and geographies. UMB is one of the entities selected by MHDC to securitize, market, and sell the bonds.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Columbia MSA, Jefferson City MSA, and St. Joseph MSA is not inconsistent with the bank's overall "Low Satisfactory" performance under the service test in Missouri. Performance in the limited-scope areas did not have an impact on the service test rating in the state. Refer to Table 15 in the state of Missouri section of appendix D for the facts and data that support these conclusions.

State Rating

State of Nebraska

CRA Rating for Nebraska⁷:	Satisfactory
The lending test is rated:	Low Satisfactory
The investment test is rated:	High Satisfactory
The service test is rated:	Low Satisfactory

The major factors that support this rating include:

- A good level of lending for home mortgage loans and small loans to businesses;
- The geographic distribution of home mortgage and small loans to businesses is adequate, based on poor home mortgage performance and adequate small business lending performance;
- The distribution of loans by borrower income level and revenue of businesses is adequate, based on good home mortgage performance and poor small business lending performance;
- Overall good investment performance, when considering performance in the Omaha AA;
- Delivery systems are reasonably accessible to low- and moderate-income individuals; and
- Bank personnel provided a good level of community development services during the evaluation period.

Description of Institution's Operations in Nebraska

UMB operates one retail branch and one ATM in the state of Nebraska. The state of Nebraska represents 1.12 percent of the bank's deposit base and approximately 1.30 percent of the loan originations. As of June 30, 2016, UMB had \$176.75 million in deposits in the state of Nebraska. The bank's focus in Nebraska is on commercial lending and banking. UMB's total CRA reportable loans in Nebraska were approximately 1.30 percent of total CRA reportable lending. Approximately 82 percent of lending in Nebraska was small loans to businesses.

Refer to the market profiles for the state of Nebraska in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

⁷ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Scope of Evaluation in Nebraska

For the state of Nebraska, we completed a full-scope evaluation of the bank's only AA, the Omaha MSA. The Omaha MSA accounts for 1.12 percent of the bank's total deposits. The AA has one branch, which totals 1.73 percent of UMB's total branch network. Our review will not include an analysis of home purchase lending, home improvement lending, multifamily lending or small farm lending. The bank did not originate at least 20 of these types of loans throughout the evaluation period. We will put more weight on the bank's performance in providing small loans to businesses. Small loans to businesses total 82.14 percent of the total loan originations in the AA.

We contacted a community organization in the Omaha MSA that provides financing for properties in low- and moderate-income geographies. The community contact stated low- and moderate-income borrowers are having a hard time qualifying for home mortgage financing. The community contact believed that many banks have yet to relax their tightened underwriting standards post-recession, exacerbating access to affordable mortgage credit for low- and moderate-income borrowers.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN Nebraska

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Nebraska is rated "Low Satisfactory". Based on a full-scope review, the bank's performance in the Omaha MSA is adequate. We gave more weight to small loans to businesses because they represent approximately 80 percent of the CRA reportable loan activity throughout the evaluation period.

Lending Activity

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

The bank's overall lending activity in the state of Nebraska is good. This considers competition for all types of loans products. According to the June 30, 2016 FDIC Summary of Deposit Report, UMB had a deposit market share of 0.69 percent. UMB's deposit market share ranked 14th out of 35 depository institutions. This ranking placed the bank in the top 40 percent of all depository institutions in the AA. Based on 2016 Peer Mortgage Data, UMB achieved a 0.01 percent market share of the home mortgage refinance market. UMB ranked 221st out of 233 lenders in home mortgage refinance originations. The top five lenders in the AA combined for a 39.35 percent market share of originations.

UMB achieved a 0.13 percent market share of small loans to business originations, which ranked the bank 30th out of 70 lenders in the AA. This puts UMB in the top 42 percent of all lenders. The top five lenders of small loans to business originations are large credit card lenders. The top five banks had a total market share of 62.73 percent of small loans to

business originations. UMB's average loan amount significantly exceeds the top 15 lenders in terms of originations. UMB's market share of small loans to businesses volume is 1.30 percent, which ranks 19th. UMB's volume of small loans to businesses market share exceeds its overall deposit market share.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans is adequate. This is based on the full-scope review of the Omaha MSA. In performing our analysis, we considered the fact that only 36.63 percent of homes in low-income geographies were owner-occupied.

Home Mortgage Loans

Refer to Tables 4 in the state of Nebraska section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

The overall geographic distribution of home mortgage loans is poor.

The overall geographic distribution of home mortgage refinance loans is poor. The percentage of loans made in low-income geographies was significantly below the percentage of owner-occupied units in these geographies. The percentage of loans made in moderate-income geographies was significantly lower than the percentage of owner-occupied units in these geographies. The bank's market share in low-income geographies was below its overall market share for home mortgage refinances. The bank's market share in moderate-income geographies was below its overall market share for home mortgage refinances.

Small Loans to Businesses

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

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

The percentage of small loans to businesses made in low-income geographies was significantly lower than the percentage of businesses in these geographies. The percentage of small loans to businesses made in moderate-income geographies was somewhat lower than the percentage of businesses in these geographies. The bank's market share of small loans to businesses in low-income geographies was below its overall market share. The bank's market share of small loans to businesses in moderate-income geographies significantly exceeds its overall market share.

Lending Gap Analysis

We reviewed summary reports, maps, and analyzed UMB's home mortgage, and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of the bank's lending is adequate. In performing our analysis, we considered the general affordability of housing to low- and moderate-income borrowers.

The relatively high housing costs compared to low-income family income levels somewhat impacts these borrowers' ability to purchase homes.

Home Mortgage Loans

Refer to Table 10 in the state of Nebraska section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The overall borrower distribution of home mortgage refinance loans is good. In evaluating the borrower distribution of home mortgage loans in the Omaha MSA, we identified affordability issues with low-income borrowers. Thus, we placed more weight on the bank's performance in moderate-income census tracts.

The percentage of home mortgage refinance loans made to low-income borrowers was lower than the percentage low-income families. The percentage of home mortgage refinances made to moderate-income borrowers significantly exceeded the percentage of moderate-income families. The bank's market share of low-income borrowers exceeded its overall market share of home mortgage refinances. The bank's market share of moderate-income borrowers was below its overall market share of home mortgage refinances.

Small Loans to Businesses

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

The overall borrower distribution of small loans to businesses is poor. The percentage of small loans to small businesses (businesses with gross annual revenue of \$1 million or less) was significantly lower than the percentage of small businesses. The bank's market share of loans to small businesses was below its overall market share of loans to small businesses.

Community Development Lending

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

The volume of CD lending had a neutral impact on the lending performance in the Omaha MSA. During the evaluation period, the bank originated seven CD loans totaling \$47.45 million. Examples of some CD loans originated during the evaluation period include:

- A \$7.9 million loan to support a nonprofit organization that provides housing, behavior counseling, and treatment to support low- and moderate-income at risk youth.
- A \$20.3 million refinance loan to a nonprofit in support of community services. The

borrower provides programming training and employs individuals with disabilities and other disadvantages, including at risk youth. The organization helps unemployed or underemployed persons that are low- or moderate-income enhance their work skills and helps people with a lack of job skills find gainful employment.

Product Innovation and Flexibility

The bank does not have any products we consider innovative or flexible.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Nebraska is rated "High Satisfactory", when considering performance in the AA and the greater statewide area. Based on a full-scope review, the bank's performance in the Omaha MSA is good.

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

During the evaluation period, UMB made three investments, 20 grants, and donations totaling \$1.37 million. There were no prior period investments in the AA. The \$1.37 million represents 7.58 percent of allocated Tier One Capital for the AA. This level is considered good when factoring in the nearly five-year evaluation period.

UMB's responsiveness to CD needs in the AA is excellent. In terms of dollar volume, 100 percent of the bank's CD investments were allocated to supporting affordable housing, an identified need in the AA. The bank met this need through two mortgage backed securities and one LIHTC. The LIHTC had a direct and greater impact on the low- and moderate-income individuals in the AA. Examples of investments made during the evaluation period include:

- A \$389 thousand Tax Credit from the Kansas City Midwest Housing Equity Group, which is a state equity fund, created for affordable housing. The Group finances the new construction or renovation of affordable housing in cooperation with development partners. Two projects are located in the Omaha MSA.
- A \$93,000 investment of MBS that support affordable housing of which all the borrowers are low- and moderate-income and reside in the AA.
- An \$861 thousand MBS pool of 20 loans, which were to low-income borrowers. Five of the loans were located in low- and moderate-income census tracts within the Omaha AA.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Nebraska is rated "Low Satisfactory". Based on a full-scope review, the bank's performance in the Omaha MSA is adequate.

Retail Banking Services

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

UMB's branch distribution in the Omaha MSA is poor and consists of one branch. Branches are unreasonably inaccessible to geographies and individuals of different income levels. UMB has no branches in low-income tracts, where nearly 14 percent of the population resides. UMB has no branches in moderate-income tracts, where nearly 23 percent of the population resides.

Branch openings and closing have adversely affected the accessibility of the bank's delivery systems to low- and moderate-income geographies or individuals. Due to the increased use of alternative delivery systems by bank customers, branch and teller transactions have declined. The change in customers' behavior in using these alternative delivery systems has led to some branch closures. To maintain branches in low- and moderate-income areas, efforts were made to cross-train employees to meet customer needs. As a result, this branch model retains branches in low- and moderate-income areas by mitigating costs and utilizing branch employees with a diverse skill set to meet customer needs. This model was applied to the only remaining branch that is an upper-income tract. The bank closed two branches. One closed branch was in a moderate-income tract. A full service UMB branch is located within three miles, and there are additional banks in the area. The other bank branch was closed due to bank analysis indicating low utilization. The bank did not open any branches in the Omaha MSA during the evaluation period.

UMB's hours and services offered throughout the AA do not vary in a way that inconvenience portions of the AA, particularly low- and moderate-income geographies or individuals. Services offered and hours of operation are comparable among locations. Refer to the Description of Institution section of this document for detail regarding UMBs other alternative delivery systems.

Community Development Services

UMB provided a good level of community development services in the Omaha MSA. UMB staff provided their expertise to three different organizations, which included three leadership positions that promoted community development initiatives in the AA. Throughout the evaluation period, five bank employees volunteered their time for a total of 165 hours. Some examples of services performed by employees include:

- One employee provided leadership assistance to the United Way of the Midlands. Services included reviewing and approving budgets for an organization. United Way funds agencies that serve low- and moderate-income families.
- Two UMB employees provided services to Big Brothers Big Sisters of the Midlands. One employee provided fund raising assistance and the other employee provided leadership and technical assistance

State Rating

State of Oklahoma

CRA Rating for Oklahoma⁸:	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:

- The bank's overall lending activity in the state of Oklahoma is good;
- Overall geographic distribution of loans is excellent, as evidenced by excellent geographic distribution of small loans to businesses;
- Overall distribution of lending by income level of borrower is adequate;
- The level of CD lending had a neutral impact on lending test performance;
- Overall excellent investment performance, when considering performance in all Oklahoma AAs and the broader statewide area;
- Delivery systems are reasonably accessible to low- and moderate-income individuals; and
- Bank personnel provided an adequate level of community development services during the evaluation period.

Description of Institution's Operations in Oklahoma

UMB operates five branches and five ATMs within two AAs in the state of Oklahoma. The Oklahoma AAs include two metropolitan areas, the Oklahoma City MSA and Tulsa MSA. As of June 30, 2016, UMB had total statewide deposits of \$233.76 million. This accounts for 1.48 percent of total UMB deposits. UMB offers its full range of products and services in Oklahoma, but focuses on commercial banking and lending. Total CRA reportable loans in Oklahoma were 4.22 percent of the bank's total CRA reportable loan originations during the evaluation period. Approximately 87 percent of UMB's CRA reportable loans in Oklahoma were small business loans.

⁸ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Refer to the market profiles for the state of Oklahoma in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Oklahoma

For the state of Oklahoma, we conducted a full-scope review on the Oklahoma City MSA. We conducted a limited-scope review of the Tulsa MSA. Ratings for the state of Oklahoma are based primarily on the performance in Oklahoma City MSA. The Oklahoma City MSA has 83.23 percent of the deposits UMB has in Oklahoma. The Oklahoma City MSA has approximately 74 percent of all HMDA and small business originations in Oklahoma. The Oklahoma City MSA has 80 percent of all UMB's branches in the state. Refer to the tables in appendix A for more information on the Oklahoma AAs.

The community contacts in the Oklahoma City MSA indicated that there are many opportunities for financial institution involvement in community needs in the AA, and banks have been responsive. The three community contacts indicated the need for more participation in dollars committed and increased opportunities for affordable housing.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN Oklahoma

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Oklahoma is rated "High Satisfactory". Based on a full-scope review, the bank's performance in the Oklahoma City MSA is good. We gave more weight to small loans to business performance in the various lending tests. This is because small loans to businesses made up approximately 71 percent of CRA reportable loans throughout the evaluation period.

Lending Activity

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

The bank's overall lending activity in the state of Oklahoma is good. Considering the bank's focus on business lending, we placed the most emphasis on its performance in small business lending activity.

In the Oklahoma City MSA, according the June 30 2016 FDIC Summary of Deposit Report, UMB had an overall deposit market share of 0.85 percent. UMB's deposit market share ranks 28th out of 54 depository banks in the AA. This ranks UMB's deposit market share in the top 51.85 percent of all depository banks.

The bank's overall home mortgage lending is adequate. Based on 2015 Peer Mortgage Data, UMB achieved a 0.03 percent market share of home purchase loans. UMB ranked 148th out of

313 lenders in the AA, which is in the top 47.28 percent of all lenders. There was moderate competition for home purchase originations, the top five lenders accounted for 30.96 percent of the overall market share. UMB had a 0.06 percent market share of home mortgage refinance loans. UMB's ranked 153rd out of 292 home mortgage refinance lenders in the AA. UMB's market share ranking placed them in the top 52.40 percent of all home mortgage refinance lenders. There were opportunities to lend in home mortgage refinance originations, as the top five lenders accounted for a 25.70 percent market share.

The bank's overall small loans to business lending activity is excellent. UMB ranked 23rd out of 90 lenders in originating small loans to businesses, with 0.69 percent market share. This market share ranked UMB in the top 25.56 percent of all lenders in the AA. UMB's market share ranking of small loans to business originations is higher than its overall deposit market share ranking in the AA. Many of the top lenders are large credit card lenders with smaller average loan amounts. The top five lenders in the AA had a combined 53.77 percent market share of small loans to business originations. UMB's market share of small loans to businesses when measured by loan volume is 3.23 percent. UMB ranks 9th in terms of market share of loan volume of small loans to businesses.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans is excellent. In performing our analysis, we placed greater weight on the bank's performance in providing small loans to businesses.

Home Mortgage Loans

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

Overall, the geographic distribution of home mortgage loans is good. In evaluating the geographic distribution of home mortgage loans in the Oklahoma City MSA, it is important to note that the AA's low- and moderate-income census tracts contain a low percentage of owner-occupied housing units. According to the 2010 U.S. Census, owner-occupied housing units in low-and moderate-income census tracts are 35.03 percent and 40.38 percent of all housing units.

Overall, the geographic distribution of home purchase loans is good. The percentage of loans in low-income geographies significantly exceeded the percentage of owner occupied housing in the AA. The percentage of loans in moderate-income geographies was near the percentage of owner-occupied units in these geographies. The bank's market share of home purchase loans in low-income geographies was significantly below its overall market share. The bank's market share of home purchase loans in moderate-income geographies significantly exceeded its overall market share.

Overall, the geographic distribution of home mortgage refinance loans is adequate. The percentage of home mortgage refinance loans in low-income geographies was near the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income geographies was significantly lower than the percentage of owner-occupied units in these geographies. The bank's market share in low-income geographies was significantly below its overall market share. The bank's market share in moderate-income geographies significantly exceeded its overall market share of home mortgage refinance loans.

Small Loans to Businesses

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

The overall geographic distribution of small loans to businesses is excellent.

The percentage of small loans to businesses in low-income geographies significantly exceeded the percentage of businesses in those geographies. The percentage of small loans to businesses in moderate-income geographies was near the percentage of businesses in those geographies. The bank's market share of loans was good. The bank's market share of loans in low-income geographies significantly exceeded its overall market share. The bank's market share of loans in moderate-income geographies was below its overall market share.

Lending Gap Analysis

We reviewed summary reports, maps, and analyzed UMB's home mortgage, and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The overall distribution of lending by income level of the borrower is adequate.

Home Mortgage Loans

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

The overall borrower distribution of home mortgage loans is adequate. In performing our analysis of home mortgage lending, we considered the general affordability of housing to low- and moderate-income borrowers. The relatively high housing costs compared to low-income family income levels somewhat impacts the ability of these borrowers to purchase homes. The typical low-income borrower would not be able to qualify for a traditional mortgage loan in the Oklahoma City AA during the evaluation period.

The overall borrower distribution of home purchase loans is adequate. The percentage of loans to low-income borrowers was significantly lower than the percentage of low-income families. The percentage of home purchase loans to moderate-income borrowers substantially met the percentage of moderate-income families. The bank's market share of low- and moderate-income borrowers was significantly below its overall market share.

The overall borrower distribution of home mortgage refinance loans is poor. The percentage of home mortgage refinance loans provided to low-income borrowers was somewhat lower than the percentage of low-income families. The percentage of loans made to moderate-income borrowers was lower than the percentage of moderate-income families. The bank's market share of low-income borrowers significantly exceeded its overall market share. The bank's market share of moderate-income borrowers was significantly below its overall market share.

Small Loans to Businesses

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

The overall borrower distribution of small loans to businesses is adequate. The percentage of small loans to small businesses (businesses with gross annual revenue of \$1 million or less) was lower than the percentage of small businesses. This performance was enhanced by a good market share. The bank's market share of loans to small businesses substantially met its overall market share.

Community Development Lending

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

The volume of CD lending had a neutral impact on lending performance in the Oklahoma City MSA. During the evaluation period, the bank originated 14 CD loans totaling \$27 million.

Product Innovation and Flexibility

The bank does not have any products we consider innovative or flexible.

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 weaker than the bank's overall performance in the state. The Tulsa MSA had a neutral impact on the overall state rating. The Tulsa MSA had weaker borrower distribution of small loans to businesses. Refer to the Tables 1 through 13 in the state of (name of state) section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Oklahoma is rated "Outstanding", when considering performance in the AA and greater statewide area. Based on a full-scope review, the bank's performance in the Oklahoma City MSA is excellent.

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

During the evaluation period, UMB made three investments, 15 grants, and donations in the Oklahoma City MSA, totaling \$2.13 million. There were no prior period investments within the AA. The total of \$2.13 million represents 10.67 percent of allocated Tier One Capital for the AA. This level is considered excellent when considering the nearly five-year evaluation period.

UMB's responsiveness to CD needs in the AA is adequate. In terms of dollar volume, 29 percent of the bank's CD investments were allocated to supporting affordable housing needs in the AA. The bank met this need through two MBS. In addition, five donations totaling over \$6,000 were deemed to be responsive based on the bank's needs assessment. These donations were for community services such as free health care or after school youth programs. Examples of investments made during the evaluation period include:

- A \$463 thousand investment of MBS that supports affordable housing of which all the

borrowers are low- and moderate-income, residing within the AA.

- A \$1.49 million school bond. UMB invested in Crooked Oak Public School District (Oklahoma City, OK) which is comprised of three schools, all located in a low-income geography. In addition, at the three schools, 97 percent, 92 percent and 99 percent, respectively, of all students are eligible for the FRPL program. The purpose of the bond is to construct, furnish, equip, and/or acquire an elementary or high school in the district.

Investments – Oklahoma statewide

When considering the investments made in the Oklahoma City MSA, and investments in the greater Oklahoma statewide area, this performance had a significantly positive impact on the overall investment test rating. The bank made 59 investments which totaled \$26.55 million, and were comprised strictly of school bonds. In the vast majority of these school bonds, the bank was the underwriter for the bonds and then subsequently purchased the bonds. The bank had a significant leadership role in the issuing of these bonds and if it were not for the bank, these bonds would not have been issued.

When considering these investments and all other investments in the full- and limited-scope areas, the total dollar amount of \$31.51 million represented 131.59 percent of the allocated Tier One Capital in the state.

Conclusions for Area Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the investment test in the Tulsa MSA is not inconsistent with the full scope review, due to similar levels of investments. Refer to the Table 14 in the state of Oklahoma section of appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Oklahoma is rated "Low Satisfactory". Based on a full-scope review, the bank's performance in the Oklahoma City MSA is adequate.

Retail Banking Services

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

UMB's branch distribution in the Oklahoma City MSA is adequate. Branches are reasonably accessible to geographies and individuals of different income levels. UMB has two branches in low-income tracts, where over nine percent of the population resides. The percentage of UMB branches in the low-income tracts exceeds the percentage of the population living in these geographies. The bank has no branches in moderate-income tracts, where 32 percent

of the population resides. The percentage of UMB's branches in the moderate-income geographies is significantly below the percentage of population living in these geographies.

Branch openings and closing have generally not affected the accessibility of the bank's delivery systems to low- and moderate-income geographies or individuals. The bank closed one branch. The closed branch was in a low-income tract and consisted of a drive-up banking center. The branch was closed because a full service UMB branch with a drive-up is located within three blocks away. The bank did not open any branches in the Oklahoma city MSA during the evaluation period.

UMB's hours and services offered throughout the AA do not vary in a way that inconvenience portions of the AA, particularly low- and moderate-income geographies or individuals. Services offered and hours of operation are comparable among locations. Refer to the Description of Institution section of this document for details regarding UMBs other alternative delivery systems.

Community Development Services

UMB provided an adequate level of community development services in the Oklahoma City MSA. UMB staff provided their expertise to four different organizations, which included three leadership positions that promoted community development initiatives in the MSA. Throughout the evaluation period, ten bank employees volunteered their time for a total of 153 hours. Some examples of services performed by employees include:

- Nine employees volunteered their time with Junior Achievement of Oklahoma City. One employee provided leadership assistance while eight employees taught financial education to low- and moderate-income children.
- Two employees volunteered their time supporting the provision of social services for at risk daycare and foster children. One employee provided leadership assistance, while both participated in fundraising activities for Oklahoma Educare and partnership with Sunbeam Family Services.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope reviews the bank's performance under the service test in the Tulsa MSA is not inconsistent with the bank's overall "Low Satisfactory" performance under the service test in Oklahoma. Refer to Table 15 in the state of Oklahoma section of appendix D for the facts and data that support these conclusions.

State Rating

State of Texas

CRA Rating for Texas⁹:	Satisfactory
The lending test is rated:	Low Satisfactory
The investment test is rated:	High Satisfactory
The service test is rated:	Low Satisfactory

The major factors that support this rating include:

- An adequate level of lending for home mortgage loans and small loans to businesses;
- Overall geographic distribution of loans by geography is adequate as evidenced by good performance in home mortgage lending and adequate performance in providing small loans to businesses;
- Overall distribution of loans by income level of the borrower is very poor, with very poor home mortgage and small business lending
- Overall good investment performance when considering performance in all Texas AAs and the broader statewide area;
- Delivery systems are reasonably accessible to low- and moderate-income individuals; and
- Bank personnel provided a good level of community development services during the evaluation period.

Description of Institution's Operations in Texas

UMB operates seven branch offices and three ATMs in the state of Texas. The Texas AAs include two metropolitan areas: Dallas MD and Fort Worth MD. As of June 30, 2016, UMB had \$270.36 million in deposits in Texas. This accounts for 1.72 percent of total bank deposits. CRA reportable loans in Texas equaled 1.18 percent of UMB's total CRA reportable originations during the evaluation period.

Refer to the market profiles for the state of Texas in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Texas

⁹ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

In the state of Texas, we conducted a full-scope review on the Dallas MD. Additionally, we performed a limited-scope review of the Fort Worth MD. Ratings for the state of Texas are based primarily on the full-scope review. We placed more weight for the lending test on small loans to businesses performance. Refer to appendix A for more information.

We contacted a nonprofit community development corporation that provides neighborhood revitalization, primarily through the development of affordable housing. The community development corporation provides several social service programs to qualified low- and moderate-income persons, including homebuyer training, credit education, and financial literacy training. The contact cited a need for retail business development in the South Dallas area. Specifically, the contact cited a need for bank involvement in post-purchase counseling for homebuyers, funding for development of vacant land, and funding to encourage neighborhood oriented retail development.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN Texas

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Texas is rated "Low Satisfactory". Based on a full-scope review, the bank's performance in the Dallas MD is adequate.

Lending Activity

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

The bank's overall lending activity in the state of Texas is adequate. This is based on the full-scope review of the Dallas MD.

Lending activity in the Dallas MD is adequate. We placed more weight on the bank's small business lending performance. According to the June 30, 2016 FDIC Summary of Deposit Report, UMB has a 0.10 percent market share of deposits in the Dallas MD. This ranks the bank 51st out of 121 deposit-taking institutions in the AA. UMB ranks in the top 42.15 percent of market share of deposits.

UMB had adequate lending activity performance in providing home purchase loans in the Dallas MD. There was a lot of competition in the MD for home purchase loans, UMB ranked 232nd out of 751 home purchase lenders. The top five lenders in the market accounted for a 25.52 percent market share. UMB ranked in the top 30.89 percent of all home purchase lenders in the AA. UMB achieved a 0.03 percent market share of home purchase loans. UMB had poor lending activity in the home mortgage refinance market in the Dallas MD. UMB has a 0.01 percent market share of home mortgage refinance loans. This ranked the bank in the top 52.15 percent of all home mortgage refinance lenders.

UMB had adequate small business lending activity performance. UMB has a 0.03 percent market share of small business loan originations. The bank ranks 71st out of 189 small business lenders. This ranks the bank in the top 37.57 percent of all lenders. UMB's market share by volume of loans is 0.42 percent, which is higher than its overall deposit market share.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans by geography is adequate. UMB had adequate performance in small business and home mortgage lending.

Home Mortgage Loans

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

The overall geographic distribution of home mortgage loans is good. In evaluating home mortgage loans, it is important to note that only 23.33 percent of the units in low-income geographies were owner-occupied. Multifamily units comprised the majority of the units in low-income geographies. Over 75 percent of all units in low-income geographies were either rental units or vacant. These factors were considered when determining the conclusion for geographic distribution of home mortgage loans.

The geographic distribution of home purchase loans in the Dallas MD is excellent. The percentage of home purchase loans made in low-income geographies significantly exceeds the percentage of owner-occupied units in these geographies. The percentage of home purchase loans made in moderate-income geographies significantly exceeds the percentage of owner-occupied units in these geographies. The bank's market shares in low- and moderate-income geographies significantly exceeds its overall market share.

The geographic distribution of home refinance loans is adequate. The percentage of home mortgage refinance loans in low-income geographies is somewhat lower than the percentage of owner-occupied housing units. The percentage of home mortgage refinance loans made in moderate-income geographies significantly exceeds the percentage of owner-occupied housing units. The bank's market share in low- and moderate-income geographies is below its overall market share.

Small Loans to Businesses

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

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

The geographic distribution of small loans to business is adequate. The percentage of small loans to businesses made in low-income geographies is below the percentage of businesses in those geographies. The percentage of loans made in moderate-income geographies

significantly exceeds the percentage of businesses within those geographies. The bank's market share is poor. The bank's market share of loans made in low-income geographies is significantly below its overall market share. The bank's market share of loans made in moderate-income geographies is below its overall market share.

Lending Gap Analysis

We reviewed summary reports, maps, analyzed UMB's home mortgage, and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The overall distribution of loans by income level of the borrower is very poor.

Home Mortgage Loans

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

The overall borrower distribution of home mortgage loans is poor. In performing our analysis of home mortgage lending, we considered the general affordability of housing to low- and moderate-income borrowers. The relatively high housing costs compared to low- and moderate-income family income levels somewhat impacts the ability of these borrowers to purchase homes.

The borrower distribution of home purchase loans is very poor. The percentage of loans to low-income borrowers was significantly lower than the percentage of low-income families. The percentage of loans to moderate-income borrowers was significantly lower than the percentage of moderate-income families. The bank's market share was too small to perform a meaningful analysis.

The borrower distribution of home mortgage refinance loans is very poor. The percentage of loans made to low-income borrowers was significantly lower than the percentage of low-income families. The percentage of loans to moderate-income borrowers was significantly lower than the percentage of moderate-income families. The bank's market share was too small to perform a meaningful analysis.

Small Loans to Businesses

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

The borrower distribution of small loans to businesses is very poor. The percentage of small loans to small businesses (businesses with gross annual revenue of \$1 million or less) was significantly lower than the percentage of small businesses. The bank had a poor market

share of small loans to small businesses. The bank's market share of small loans to small businesses was significantly lower than its overall market share of loans to small businesses.

Community Development Lending

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

The volume of CD lending had a neutral impact on the lending performance in the Dallas MD. During the evaluation period, the bank originated two CD loans totaling \$14.5 million. Examples of CD loans originated during the evaluation period include:

- A \$2.5 million loan to a 192 apartment complex in a moderate-income census tract that provides affordable housing.
- A \$12 million participation loan to finance a mixed-use project consisting of construction of a 216 unit multifamily community and retail space. The loan will provide funds for revitalization and stabilization of a low-income neighborhood. The project is adjacent to the Bishop Arts area of South Dallas, with support from the city is undergoing a revitalization of residences and retail.

Product Innovation and Flexibility

The bank does not have any products we consider innovative or flexible.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the lending test in the Fort Worth MD is not inconsistent with the bank's overall "High Satisfactory" performance under the lending test in Texas. Refer to the Tables 1 through 13 in the state of Texas section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Texas is rated "High Satisfactory", when considering performance in all AAs in the state and the greater statewide area. Based on a full-scope review, the bank's performance in the Dallas MD is good.

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

During the evaluation period, UMB made 18 investments, grants, and donations totaling \$2.74 million. UMB had no outstanding investments within the AA made prior to the current

evaluation period. Total qualifying investments represent 13.67 percent of allocated Tier One Capital for the AA. This level of qualifying investments demonstrates excellent performance by the bank to meet CD needs of the AA.

UMB's responsiveness to CD needs in the AA is adequate. The two large investments made in the Dallas MSA AA were both for affordable housing which was not identified as a need in the community based on the bank's needs assessment, or the community contact. However, the bank did make four small donations that met community service needs identified in the needs assessment. Examples of investments made during the evaluation period include:

- The purchase of two MBS totaling \$2.68 million, which consisted of 100 percent of the loans made to low- and moderate-income borrowers within the AA.

Investments – Texas statewide

When considering the investments made in all AAs in the state, along with investments in the greater Texas statewide area, this performance had a positive impact on the overall investment test rating in the state. In addition to the CD investments that benefit the bank's AAs, UMB made four qualifying investments totaling \$1.68 million during the evaluation period in the broader statewide area. The investments did not have a purpose, mandate, or function to service the bank's AAs in the state.

Conclusions for Area Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the investment test in the Fort Worth MD is weaker than the bank's overall "High Satisfactory" performance in the state of Texas, due to lower levels of qualified investments. However, this did not impact the overall rating because we also considered the broader regional area investment, which included an investment in an affiliated SBIC, which made a \$3.5 million small business loan in the Fort Worth MD AA. Refer to the Table 14 in the state of Texas section of appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Texas is rated "Low Satisfactory". Based on a full-scope review, the bank's performance in the Dallas MD is adequate.

Retail Banking Services

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

UMB's branch distribution in the Dallas MD is adequate. Branches are reasonably accessible to geographies and individuals of different income levels. UMB had one branch in a low-income geography in this AA. The percentage of UMB branches in low-income geographies

exceeded the percentage of population living in these geographies. The bank had no branches in moderate-income tracts. The percentage of UMB's branches in moderate-income geographies was significantly below the percentage of population living in these geographies.

Branch openings and closing have generally not affected the accessibility of the bank's delivery systems to low- and moderate income geographies or individuals. Due to increased use of alternative delivery systems by UMB customers, branch and teller transactions have declined. The change in customers' behavior in using these alternative delivery systems has led to some branch closures. To maintain branches located in low- and moderate-income areas, efforts were made to cross-train employees to meet customer needs. As a result, this branch model retains branches in low- and moderate-income areas by mitigating costs and utilizing branch employees with a diverse skill set to meet customer needs. This model was applied to one low-income branch and one branch within a middle-income tract. UMB opened five branches and closed one branch. One new branch is located in a low-income tract. The closed branch was in the upper-income tract and was closed because a full service UMB branch is located within one mile.

UMB's hours and services offered throughout the AA do not vary in a way that inconvenience portions of the AA, particularly low- and moderate-income geographies or individuals. Services offered and hours of operation are comparable among locations. Refer to the Description of Institution section of this document for detail regarding UMBs other alternative delivery systems.

Community Development Services

UMB provided a good level of community development services in the Dallas MD. UMB staff provided their expertise to three different organizations, which included three leadership positions that promoted community development initiatives in the MD. Some examples of services performed by employees include:

- One employee provided leadership assistance to Habitat for Humanity. Habitat for Humanity provides affordable housing to low- and moderate-income individuals and families. This includes obtaining home ownership and revitalizes and stabilizes neighborhoods.
- One employee provided leadership assistance to an organization that offers an after school program for low- and moderate-income students.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the service test in the Fort Worth MD is not inconsistent with the bank's overall "Low Satisfactory: performance under the service test in Texas. Refer to Table 15 in the state of Texas section of appendix D for the facts and data that support these conclusions.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (excludes CD loans): (01/01/12to 12/31/16) Investment and Service Tests and CD Loans: (06/05/12 to 12/31/16)	
Financial Institution	Products Reviewed	
UMB Bank, National Association Kansas City, MO	Home Mortgage, Small Business, Small Farm, and Community Development Loan Data; Qualified Investments; Retail and Community Development Services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
UMB Capital Corporation	Subsidiary of UMB	Qualified Investments
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Multistate MSAs: Kansas City MSA #28140 St. Louis MSA #41180	Full-scope Full-scope	
State of Arizona Phoenix MSA #38060	Full-scope	
State of Colorado Denver MSA #19740 Colorado Springs MSA #17820	Full-scope Limited-scope	
State of Kansas: Non-MSA	Full-scope	Atchison, Bourbon, Barton, Dickinson, Russel, and Saline Counties
Lawrence MSA #29940 Manhattan MSA #31740 Topeka MSA #45820 Wichita MSA #48620	Limited-scope Limited-scope Full-scope Full-scope	
State of Missouri: Non-MSA	Full-scope	Barry, Benton, Cooper, Henry, Johnson, Lawrence, Linn, Pettis, and Sullivan Counties
Columbia MSA #17860 Jefferson City MSA #27620	Limited-scope Limited-scope	

Joplin MSA #27900 Springfield MSA #44180 St. Joseph MSA #41140	Limited-scope Full-scope Limited-scope	
State of Nebraska: Omaha MSA #36540	Full-scope	
State of Oklahoma Oklahoma City MSA #36420 Tulsa MSA #46140	Full-scope Limited-scope	
State of Texas Dallas MD #19124 Fort Worth MD #23104	Full-scope Limited-scope	

Appendix B: Summary of Multistate Metropolitan Area and State Ratings

RATINGS UMB Bank, N.A.				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
UMB Bank, N.A.	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Multistate Metropolitan Area or State:				
Kansas City MMSA	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
St. Louis MMSA	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
State of Arizona	Low Satisfactory	Outstanding	Needs to Improve	Satisfactory
State of Colorado	Low Satisfactory	Outstanding	High Satisfactory	Satisfactory
State of Kansas	Outstanding	Outstanding	Low Satisfactory	Outstanding
State of Missouri	Low Satisfactory	Outstanding	Low Satisfactory	Satisfactory
State of Nebraska	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
State of Oklahoma	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
State of Texas	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory

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

Appendix C: Community Profiles for Full-Scope Areas

Kansas City MMSA

Demographic Information for Full-Scope Area: Kansas City MO-KS						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	483	13.46	23.60	30.64	28.99	3.31
Population by Geography	1,786,584	8.62	21.93	35.00	34.43	0.01
Owner-Occupied Housing by Geography	473,956	5.51	18.56	37.17	38.76	0.00
Businesses by Geography	116,217	6.92	19.07	31.13	41.05	1.83
Farms by Geography	3,173	3.15	14.43	41.76	40.31	0.35
Family Distribution by Income Level	456,673	20.05	17.36	21.24	41.35	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	170,860	16.11	32.88	34.47	16.54	0.00
Median Family Income = \$68,846		Median Housing Value = \$163,192				
HUD Adjusted Median Family Income for 2016 = \$74,700		Unemployment Rate = 3.67%				
Households Below the Poverty Level = 11%						

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

The Kansas MMSA AA consists of Johnson and Wyandotte, Kansas. The MMSA also includes the following areas: Cass, Clay, Jackson and Platte, Missouri. The AA complies with the regulation and does not arbitrarily exclude any low- or moderate-income areas.

This AA is composed of 483 census tracts. There are 65, 114, 148, 140 and 16 census tracts for the income levels of low, moderate, middle, upper income and NAs, respectively. Total population for the AA is 1,786,581 with 545,769 or 30.55 percent residing in low- and moderate-income census tracts

Employment and Economic Factors

The January 2017 unemployment rate for this AA was 4.3 percent, compared to the same time National and Missouri rates of 4.8 and 4.2 percent, respectively. The large employers of the area includes the following: Cerner Corporation, HCA Midwest Health System, Saint Luke's Health System, Ford Motor Co., Kansas City Assembly Plant, The University of Kansas Hospital, Federal Government, State of Missouri, Olathe Public Schools, and City of Kansas City.

Per the June 30, 2016 FDIC Deposit Market Share Reports, there were 135 deposit-taking institutions in the AA of varying size. UMB, with 31 bank branches in the AA, is ranked 1st with a 19.61 percent deposit market share. The five following banks with market shares less than

UMB are, Commerce Bank with a market share of 13.25 percent, Bank of America, N.A. with a market share of 10.38 percent, U.S. Bank, NA with a market share of 6.17 percent, Capitol Federal Savings Bank with a market share of 4.58 percent, and NBH Bank with a market share of 3.03 percent.

Housing

The 2010 U.S. Census reported total housing units in the AA of 769,613. Of the total number of housing units, 473,956 or 61.58 percent are owner-occupied units; 222,219 or 28.87 percent are occupied rental units; 73,438 or 9.54 percent are vacant units. Within the low-income geographies, 33.23 percent of the housing units were owner-occupied, 45.26 percent were occupied rentals, and 21.52 percent were vacant. The mix of housing units for the moderate-income geographies was 47.22 percent owner-occupied, 39.77 percent rentals, and 13.01 percent vacant.

The Kansas City MMSA is a relatively high-cost home area, limiting access to affordable home ownership. The 2016 median housing value in the AA is \$215,000, according to the 2016 Realtor.com data. The median housing value increased 48.38 percent from the 2012 level of \$144,900. One simplistic 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. Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$37,350 per year (or less than 50 percent of the 2016 FFIEC adjusted median family income in the AA) could afford a \$173,940 mortgage with a payment of \$934 per month. A moderate-income borrower making \$59,760 per year (or less than 80 percent of the 2016 FFIEC adjusted median family income in the AA) could afford a \$278,305 mortgage with a payment of \$1,494 per month.

This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA with a housing value of \$215,000 and an estimated payment of \$1,154.

Community Contacts

We contacted two non-profit housing related organizations within the AA. The following needs were discussed as to what area banks can do to further meet the needs within the AA:

- Better access to affordable home purchase loans;
- Access to affordable home repair loans;
- Need for a CDFI to operate a loan pool for people that do not meet the traditional credit standards for home repairs and purchase loans in the area;
- Creative credit help for those residents upside down (borrowers have negative equity) in their homes;
- Provide small dollar loans (\$500-\$2,500) for area small businesses; and
- Provide financial education and counseling for area residents and small business owners.

St. Louis MSA

Demographic Information for Full-Scope Area: St. Louis MO-IL						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	547	13.71	19.38	37.29	29.25	0.37
Population by Geography	2,436,804	8.67	18.31	39.43	33.53	0.05
Owner-Occupied Housing by Geography	683,619	4.94	16.45	41.92	36.69	0.00
Businesses by Geography	142,017	6.28	16.12	36.01	41.46	0.13
Farms by Geography	3,727	1.93	11.89	43.84	42.26	0.08
Family Distribution by Income Level	627,159	20.94	16.70	20.74	41.61	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	236,105	15.93	27.82	38.33	17.91	0.01
Median Family Income = \$66,798						
HUD Adjusted Median Family Income for 2016 = \$72,200						
Households Below the Poverty Level = 12%						
			Median Housing Value = \$174,444			
			Unemployment Rate = 4.11%			

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

The St. Louis MMSA consists of Madison and St. Clair in the state of Illinois and four contiguous counties of Jefferson, St. Louis City, St. Louis and St. Charles in the state of Missouri. The AA complies with the regulation and does not arbitrarily exclude any low- or moderate-income areas.

This AA is composed of 547 census tracts. The census tracts are 75, 106, 204, 160 and 2 for the income levels of low, moderate, middle, upper income and NAs, respectively. Total population for the AA is 2,436,804 with 657,578 or 26.98 percent residing in low- and moderate-income census tracts.

Recent News on this AA

During July 20, 2016, marking one of the highest increases in construction value from year to year, more than \$1 billion worth of total added construction value has been made to neighborhoods and business districts in the City of St. Louis. The City's Building Division issued 4,929 building permits and 15,735 trades permits (mechanical, electrical, and plumbing permits) for residential and commercial construction in fiscal year 2016. The construction increase represents all types of construction projects, including office rehabs, new lofts, hospital construction, single family and multi-family residential construction, as well as new and rehab commercial construction. City officials expect this level of growth to continue into 2017 and beyond with several more projects coming up such as Armory, Jefferson Arms, and the Railway Exchange, as well as residential affordable housing projects planned for North Sarah, Adams Grove and East Fox Homes.

The U.S. Housing and Urban Development (HUD) announced during December 12, 2016, the winners of the prestigious Choice Neighborhoods Implementation Grant for one of the neighborhoods that will benefit from the award: the Near North Side in the City of St. Louis. The \$29.5 million grant on behalf of the City and its partners is dedicated to transforming the Near North Side. That transformation plan includes creating nearly 700 new and rehabbed affordable and mixed income housing units, along with a new community center. The plan also focuses on increasing home ownership along with promoting health, education, public safety, social services, job training, entrepreneurship and neighborhood enhancement.

Employment and Economic Factors

The January 2017 unemployment rate for this AA was 4.3 percent, compared to the same time National and Missouri rates of 4.8 and 4.2 percent, respectively. The large employers of the area includes the following: Anheuser-Busch Companies, Emerson Electric, May Department Stores, Graybar Electric, Monsanto Company, BJC Health Systems, Boeing International Defense Systems, Scott Air Force Base, Washington University, Wal-Mart Stores and SSM Health Care.

Strong competition exists for financial services within the AA. Per the June 30, 2016 FDIC Deposit Market Share Reports, there were 132 deposit-taking institutions in the AA of varying size. UMB has 15 branches within the AA. UMB is ranked 14th with a 1.35 percent deposit market share. The top five banks, measured by market share are: Scottrade Bank with a market share of 15.42 percent, U.S. Bank, NA with a market share of 14.13 percent, Bank of America, N.A. with a market share of 11.84 percent, Stifel Bank and Trust with a market share of 8.29 percent, and Commerce Bank with a market share of 6.78 percent.

Housing

The 2010 U.S. Census reported total housing units in the AA were 1,069,377. Of the total number of housing units, 683,618 or 63.93 percent are owner-occupied units; 282,604 or 26.43 are occupied rental units; 103,154 or 9.65 percent are vacant units. Within the low-income geographies, 32.13 percent of the housing units were owner-occupied, 45.81 percent were occupied rentals, and 22.06 percent were vacant. The mix of housing units for the moderate-income geographies was 52.13 percent owner-occupied, 34.45 percent rentals, and 13.42 percent vacant.

The St. Louis MMSA is a relatively high-cost housing area, limiting low- and moderate-income access to affordable home ownership. The 2016 median housing value in this AA is \$170,000, according to the 2016 Realtor.com data. The median housing value increased 17.24 percent from the 2012 level of \$145,000. One simplistic 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. Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$36,100 per year (or less than 50 percent of the 2016 FFIEC adjusted median family income in the AA) could afford a \$168,119 mortgage with a payment of \$903 per month. A moderate-income borrower making \$57,760 per year (or less than 80 percent of the 2016 FFIEC adjusted median family income in the AA) could afford a \$268,991 mortgage with a payment of \$1,444 per month.

This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA with a value of \$170,000 and an estimated payment of \$913.

Community Contact

Overall, local banks were responsive to the various community credit needs. However, the community nonprofit housing organization provided the following needs:

- The need for area banks to contribute funds to the community-building fund;
- Provide additional training to area nonprofits to understand the financing needed for community development; and
- Develop better relationships with area nonprofits to understand the needs within the AA.

State of Arizona

Phoenix MSA

Demographic Information for Full-Scope Area: Phoenix MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	916	9.39	23.91	31.99	33.62	1.09
Population by Geography	3,817,117	8.42	24.46	33.25	33.69	0.18
Owner-Occupied Housing by Geography	916,515	3.61	20.72	35.75	39.90	0.02
Businesses by Geography	313,943	6.51	15.38	29.41	48.12	0.57
Farms by Geography	5,938	5.46	15.54	31.98	46.60	0.42
Family Distribution by Income Level	913,798	20.93	17.44	20.15	41.48	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	236,105	13.75	36.07	32.18	18.00	0.00
Median Family Income = \$64,408		Median Housing Value = \$258,903				
HUD Adjusted Median Family Income for 2016 = \$64,000		Unemployment Rate = 3.48%				
Households Below the Poverty Level = 12%						

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

The Phoenix MSA consists of Maricopa County. The AA complies with the regulation and does not arbitrarily exclude any low- or moderate-income areas.

This AA is composed of 916 census tracts. There are 86, 219, 293, 308 and 10 census tracts for the income levels of low, moderate, middle, upper income and NAs, respectively. Total population for the AA is 3,817,117 with 1,254,952 or 32.88 percent residing in low- and moderate-income census tracts.

Employment and Economic Factors

The January 2016 unemployment rate for this AA was 4.3 percent, compared to the same time National and Arizona rates of 4.8 and 4.2 percent, respectively. The large employers of the area include the following: State of Arizona, Wal-Mart Stores, Banner Health, City of Phoenix, Wells Fargo Bank, NA, Bank of America, NA, Maricopa County, Arizona State University, Apollo Group, Inc., JPMorgan Chase and Company, Intel Corp., US Airways, and Mesa Public Schools/Mesa Unified School District.

Per the June 30, 2016 FDIC Deposit Market Share Reports, there were 58 deposit-taking institutions in the AA of various sizes. UMB has seven bank branches within the AA and is ranked 14th with a 0.65 percent deposit market share. The top five banks are: JPMorgan Chase Bank, NA with a market share of 27.20 percent, Wells Fargo Bank, N.A. with a market

share of 24.28 percent, Bank of America, NA with a market share of 19.80 percent, Western Alliance Bank with a market share of 5.41 percent, and Compass Bank with a market share of 3.49 percent.

Housing

The 2010 U.S. Census reported total housing units in the AA of 1,596,165. Of the total number of housing units, 916,515 or 57.42 percent were owner-occupied units; 465,487 or 29.16 percent were occupied rental units; 214,163 or 13.42 percent were vacant units. Within the low-income geographies, 27.29 percent of the housing units were owner-occupied, 54.28 percent were occupied rentals, and 18.44 percent were vacant. The mix of housing units for the moderate-income geographies was 45.97 percent owner-occupied, 38.37 percent rentals, and 15.66 percent vacant.

The Phoenix MSA is a relatively high-cost housing area, limiting access to affordable home ownership among low and moderate-income borrowers. The median housing value in the AA is \$300,000, according to the 2016 Realtor.com data. The median housing value increased 51.52 percent from the 2012 level of \$198,000. One simplistic 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. Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$32,000 per year (or less than 50 percent of the 2016 FFIEC adjusted median family income in the AA) could afford a \$149,025 mortgage with a payment of \$800 per month. A moderate-income borrower making \$51,200 per year (or less than 80 percent of the 2016 FFIEC adjusted median family income in the AA) could afford a \$238,440 mortgage with a payment of \$1,280 per month. This illustrates that low- and moderate-income borrowers would be challenged to qualify for a mortgage loan in the AA with a value of \$300,000 and estimated payment of \$1,610.

Community Contacts

We reviewed two community contacts within the AA. The two non-profit business organizations were pleased with the job local banks do within the AA. The major comment was the need for banks to develop more innovative products and services to help small businesses.

State of Colorado

Denver MSA

Demographic Information for Full-Scope Area: Denver MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	587	11.75	23.17	32.20	32.20	0.68
Population by Geography	2,433,772	11.65	23.74	32.40	32.17	0.05
Owner-Occupied Housing by Geography	616,613	6.66	19.71	35.08	38.55	0.00
Businesses by Geography	256,495	8.78	20.72	29.52	40.64	0.34
Farms by Geography	4,741	7.83	18.69	32.08	41.34	0.06
Family Distribution by Income Level	591,699	22.31	17.15	20.20	40.34	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	233,488	20.05	34.84	29.22	15.90	0.00
Median Family Income	= \$75,101	Median Housing Value		= \$265,517		
HUD Adjusted Median Family Income for 2016	= \$79,900	Unemployment Rate		= 3.74%		
Households Below the Poverty Level	= 11%					

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

The Denver-Aurora-Lakewood MSA is comprised of ten counties. UMB's Denver AA is a subset of the larger Denver-Aurora-Lakewood MSA. More specifically, the Denver AA is comprised of five counties: Adams, Arapahoe, Denver, Douglas and Jefferson, respectively. These are the most populous counties in the MSA, accounting for a little more than 85 percent of the MSA's total population (2016 AA population of 2,433,722 vs. 2016 MSA population of 2,861,900).

According to the June 30 2016 FDIC Summary of Deposit report, UMB had \$1.01 billion in deposits in the AA. UMB's deposit market share in the AA was 1.35 percent. There are 71 deposit-taking institutions in the assessment area with a total of 657 branches. UMB operates eight branches and eight deposit-taking ATMs in the AA.

There is strong competition for deposits from banks in the AA, the majority of which are large national banks. The largest competition comes from Wells Fargo Bank, N.A, US Bank, N.A., FirstBank, JPMorgan Chase Bank, N.A., KeyBank, N.A., and Bank of the West.

Employment and Economic Factors

According to the Bureau of Labor Statistics, the Denver-Aurora-Lakewood MSA had an 8.8 percent unemployment rate in January of 2010. Over the subsequent years, unemployment percentages trended downward. Hence, the unemployment rate in January 2012 was 8.5

percent, falling to 7.8 percent in 2013, decreasing to 6.1 percent in January 2014, and then 3.1 percent at the end of 2015. The Denver MSA unemployment rate has fluctuated relatively close to the national averages throughout this evaluation period. The Bureau of Labor Statistics indicates the national unemployment rate was 9.6 percent in January 2010, 8.1 percent in 2012, 7.4 percent in 2013, 6.2 percent in 2014, and then 5.3 percent for 2015.

According to Moody's Analytics, "The Denver-Aurora-Lakewood MSA is back on track after a weak start to 2016." A rapidly growing population is driving strong gains in consumer-facing industries; construction, healthcare and leisure/hospitality are rapidly adding jobs. The labor market is extremely tight though. High job availability has spurred the fastest labor force growth in nearly two decades. As the bulk of job gains have been in low- and mid-wage industries, earnings growth has been sluggish. However, white-collar services will remain the backbone of the economy, supplying well-paying jobs and drawing new workers to the metro area. Prospects are brighter in professional services, where high-tech positions make up a large share of employment. The MSA is also home to a large number of regional offices and corporate headquarters of energy firms. Rising oil and gas prices will be a boon to beleaguered energy companies, but job gains will be slow to materialize.

The top employment sectors in the Denver-Aurora-Lakewood MSA are professional and business services, government, education and health services, leisure and hospitality, and retail trade. The top five employers in the Denver MSA are HealthONE, Exempla Healthcare, Centura Health, Lockheed Martin Corp., and CenturyLink

Moody's Analytics concludes that the Denver-Aurora-Lakewood MSA's tight labor market will weigh on job growth, which will slow through the end of the decade. Tech will remain a central growth driver. Robust population growth will keep the housing market on steady footing and support consumer spending. A well-diversified economy and plethora of talent will ensure the MSA will be an above-average performer over the long term.

Housing

Owner-occupied units represent 61.06 percent of the housing in the Denver-Aurora-Lakewood MSA in 2016. Total rental units make up 31.71 percent of the housing units in 2016 and 37 percent of the housing units in the Denver-Aurora-Lakewood MSA were in low- and moderate-income census tracts. Moreover, of the 587 census tracts, 35 percent are considered low- and moderate-income. The 2010 US Census indicated the Denver-Aurora-Lakewood MSA's median average housing value was \$265,517. However, these statistics only tell part of the story. According to a front page article in the Denver Post (3/31/17) entitled "Through the Roof", "nowhere else in the country has home affordability gotten so out of whack than along the northern Front Range." The article also stated, "of the 12 counties in the U.S. most out of line with historic levels of home affordability, seven are in northern Colorado, including the top four: Adams, Arapahoe, Denver and Weld." Three of these four counties are found in the Denver-Aurora-Lakewood MSA, namely Adams, Arapahoe, and Denver, respectively.

The Denver MSA is a relatively high-cost housing area, limiting access to affordable home ownership among low and moderate-income borrowers. The 2016 median housing value in the AA is \$499,100, according to the 2016 Realtor.com data. The median housing value increased 78.31 percent from the 2012 level of \$279,900. One simplistic 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. Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$39,950 per year (or less than 50 percent of the 2016 FFIEC adjusted median family income in the AA) could afford a \$186,049 mortgage with a payment of \$999 per month. A moderate-income borrower making \$63,920 per year (or less than 80 percent of the 2016 FFIEC adjusted median family income in the AA) could afford a \$297,678 mortgage with a payment of \$1,598 per month. This illustrates that low and moderate-income borrowers would be challenged to qualify for a mortgage loan in the AA with a value of \$499,100 and an estimated payment of \$2,679.

Community Contacts

Through our community contact program, we identified a number of low- and moderate-income banking needs for the Denver-Aurora-Lakewood MSA. The following is reflective of over 300 thought leaders from the public, private, and nonprofit sectors who gathered to address the current lack of housing stock, the escalating price of housing both single family and rental, and the dearth of housing units forecasted, in particular housing *affordable* to low- and moderate-income families. The common theme was inventory and access. Access to safe, decent and affordable housing specifically tailored to low- and moderate-income families is paramount. In addition, jobs paying a livable wage remain elusive for many low- and moderate-income families exacerbating their affordable housing dilemma, so job training/job placement programs also continue to be important. Consequently, there are opportunities for financial institution involvement in addressing these community needs within the AA. However, given the large number of banks serving the Denver-Aurora-Lakewood MSA, competition for community development activities is strong.

State of Kansas

Kansas non-MSA

Demographic Information for Full-Scope Area: (Name of Multistate Metropolitan Area)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	37	0.00	10.81	72.97	16.22	0.00
Population by Geography	142,101	0.00	10.00	71.19	18.81	0.00
Owner-Occupied Housing by Geography	39,887	0.00	7.14	72.43	20.43	0.00
Businesses by Geography	8,353	0.00	15.26	67.80	16.94	0.00
Farms by Geography	956	0.00	4.08	77.41	18.51	0.00
Family Distribution by Income Level	37,226	18.07	18.48	21.68	41.77	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	13,608	0.00	14.79	72.88	12.33	0.00
Median Family Income = \$52,419		Median Housing Value = \$92,666				
HUD Adjusted Median Family Income for 2016 = \$57,700		Unemployment Rate = 2.64%				
Households Below the Poverty Level = 12%						

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

The Kansas non-MSA AA consists of the counties of Atchison, Bourbon, Russell, Barton, Saline, and Dickinson. The AA meets the requirement of the regulation and does not arbitrarily exclude low- and moderate-income geographies. According to 2010 Census data, there were no low-income census tracts in the AA.

According to the 2010 U.S. Census, the total population of the AA was 142,101. The distribution of families by income level was 18.07 percent low-income, 18.48 percent moderate-income, 21.68 percent middle-income, and 41.77 percent upper-income. The percentage of families in the AA living below the poverty level is moderate at 12 percent. The 2010 adjusted median family income for the AA was \$57,700. Low-income families in the AA, earned median annual income of \$28,850 or less, and moderate-income families earned an annual income of \$28,851 to \$46,160.

In the Kansas non-MSA AA, the bank offers a full range of commercial and consumer loan and deposit products and services. There is moderate competition for deposit and lending opportunities in the AA, with 34 FDIC-insured depository institutions operating 81 offices. Competition includes regional and community banks. UMB has six branches in the AA, and 13 deposit-taking ATMs in this AA. As of June 30, 2016, UMB's deposits in the AA totaled \$275 million, which is 7.45 percent of the market. UMB ranks 4th out of 34 depository institutions. The top five depository institutions account for 44.11 percent of total deposits in the AA. The top five depository institutions were Sunflower Bank, N.A., The Bennington State Bank, Farmers Bank & Trust, UMB Bank, N.A., and First Bank of Kansas.

Employment and Economic Factors

According to the Bureau of Labor Statistics, unemployment in this AA improved during the evaluation period for all counties. The national unemployment rate as of December 2016 was 4.7 percent. Unemployment in the various AA counties ranged from 3.7 percent to 5.5 percent, respectively. Unemployment in the AA fell significantly since January 2012 when levels ranged from 4.5 percent to 9.3 percent compared to the national unemployment rate of 8.3 percent.

Data USA provided industry employment information by county. The Kansas non-MSA is primarily rural with the bulk of the population residing in small towns. In each county, the major industries include healthcare, manufacturing, retail and education; however, the order varied depending on the county. Other top industries included food service, construction and agriculture.

Housing

According to the 2010 U.S. Census, 62.59 percent of the total housing units in the AA were owner occupied, and 25.69 percent were rental occupied units. Additionally, 7.14 percent of all owner occupied units and 18.37 percent of renter occupied units were located in moderate-income CTs. The AA does not have any low-income CTs. Additionally, 10.11 percent of all single family (1-4 unit) homes and 21.16 percent of multifamily (5 plus unit) housing units were located in moderate-income tracts. The median housing value was \$96,614 and the median monthly gross rent was \$572. Homeowners and renters with home-related costs that exceed 30.00 percent of their income totaled 11.64 and 9.34 percent, respectively.

The Kansas non-MSA is a relatively affordable market for home ownership among low- and moderate-income borrowers. The 2016 median housing value in the AA is \$102,116, according to the 2016 Realtor.com data. The median housing value decreased 2.99 percent from the 2012 level of \$105,267. One simplistic 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. Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$28,850 per year (or less than 50 percent of the 2016 FFIEC adjusted median family income in the AA) could afford a \$134,356 mortgage with a payment of \$721 per month. A moderate-income borrower making \$46,160 per year (or less than 80 percent of the 2016 FFIEC adjusted median family income in the AA) could afford a \$214,969 mortgage with a payment of \$1,154 per month. This illustrates that low- and moderate-income borrowers would qualify for a mortgage loan in the AA with a value of \$102,116 and an estimated payment of \$548.

Community Contact

We contacted two community contacts in the Kansas non-MSA area. One was a realty company in Bourbon County and one was a community organization focused on family and community resources in Atchison County. The contact in Bourbon County, located south of Kansas City, indicated an overall satisfaction with the accessibility to loans in the area. The

contact indicated that most local banks are supportive of their efforts. Home improvement lending was identified as a key need in the area due to the older housing stock.

The contact in Atchison County, located northwest of Kansas City, indicated a need for financial education in the community given frequent layoffs and utilization of part time employees by a major employer in the community. The contact mentioned that one institution used to provide these services, but no longer does. In addition to financial education, home improvement lending is also a key need given the older housing stock in the area.

In addition to the community contact, we reviewed the findings from UMB's needs assessment. UMB conducts a needs assessment annually. Needs assessments in the Kansas non-MSA from 2012 to 2016 showed the bank identified various needs within the AA each year including: affordable housing, small business/small farm lending, job creation and training, access to free health care, elderly services, food banks, youth after school and child care programs, homeless services, educational opportunities, credit counseling and a need for volunteerism and donations.

State of Kansas

Topeka MSA

Demographic Information for Full-Scope Area: Topeka MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	43	13.95	25.58	34.88	25.59	0.00
Population by Geography	177,934	10.67	22.77	35.97	30.59	0.00
Owner-Occupied Housing by Geography	48,838	5.35	19.69	38.32	36.64	0.00
Businesses by Geography	9,510	20.13	17.07	37.14	25.67	0.00
Farms by Geography	336	2.38	8.63	34.52	54.46	0.00
Family Distribution by Income Level	46,676	21.95	16.53	22.24	39.28	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	17,961	17.12	33.71	32.53	16.65	0.00
Median Family Income = \$61,110		Median Housing Value = \$111,440				
HUD Adjusted Median Family Income for 2016 = \$65,600		Unemployment Rate = 3.67%				
Households Below the Poverty Level = 14%						

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

The Topeka AA consists of Shawnee County only, which is a part of the Topeka MSA. Topeka, the state capital of Kansas, is located approximately 70 miles west of Kansas City, MO.

According to the June 30, 2016 FDIC Summary of Deposits report, UMB had \$248 million in deposits within this AA with a market share of 5.82 percent. There were 79 deposit-taking institutions in the AA, and UMB had two branches. One of the two branches was located in a moderate-income census tract.

There is robust competition for deposits from thrifts and national banks. Some of the largest competition comes from Capitol Federal Savings Bank, CoreFirst Bank and Trust; Bank of America, N.A, Kaw Valley Bank and US Bank, N.A.

The 2010 US Census indicates the population of the MSA was 177,934 individuals. The Topeka AA has 43 census tracts, which are designated 13.95 percent low-income, 25.58 percent moderate-income, 34.88 percent middle-income, and 25.58 percent upper-income.

Employment and Economic Factors

According to the Bureau of Labor Statistics, the Topeka MSA had a 5.9 percent unemployment rate in December 2012. Over the subsequent five years, unemployment percentages have consistently decreased. The unemployment rate in December 2013 was 4.8 percent; in

December 2014, 4.1 percent; in December 2015, 4.7 percent and fell to 3.9 percent in December 2016. The Topeka MSA unemployment rates have been consistently lower than the national averages throughout the evaluation period, which is reflective of a stable economy. The Bureau of Labor Statistics indicates the national unemployment rate was 8.3 percent in December 2012; 7.7 percent in December 2013; 6.7 percent in December 2014; 5.5 percent in December of 2015; and 4.9 percent in December of 2016.

Moody's Analytics states, "There is a stable base encompassing the Kansas state capitol of Topeka." According to City-Data.com (collects and analyzes data from a variety of government and private sources), government and services comprise more than 50 percent of the metropolitan Topeka economy. Fortune 500 companies that have established manufacturing facilities in Topeka include Burlington Northern Santa Fe Railway, Frito-Lay, Inc., Goodyear Tire and Rubber, Hill's Pet Nutrition, Payless Shoe Source, and Hallmark Cards, Inc.

Housing

According to the 2010 US Census, owner-occupied units made up 62.09 percent and rental-occupied units made up 30.80 percent of total housing in the Topeka MSA. Of total housing units, 36 percent were in low- and moderate income census tracts. Additionally, of the 43 census tracts, 40 percent are considered low- and moderate-income.

The Topeka MSA is relatively affordable for home ownership among low- and moderate-income residents. The median housing value in the AA is \$104,500, according to the 2016 Realtor.com data. The median housing value increased 4.71 percent from the 2012 level of \$99,800. One simplistic 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. Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$32,800 per year (or less than 50 percent of the 2016 FFIEC adjusted median family income in the AA) could afford a \$152,751 mortgage with a payment of \$820 per month. A moderate-income borrower making \$52,480 per year (or less than 80 percent of the 2016 FFIEC adjusted median family income in the AA) could afford a \$244,401 mortgage with a payment of \$1,312 per month. This illustrates that low- and moderate-income borrowers would qualify for a mortgage loan in the AA with a value of \$104,500 and an estimated payment of \$561.

Community Contact

A community contact was performed in this AA. The community contact identified down payment assistance and credit clean-up programs for low- and moderate-income individuals as primary credit needs. Opportunities to participate in community development activities are available in this AA. The contact further stated that affordable housing to low- and moderate-income home buyers is available; however, the selection is not very good. Additionally, low- and moderate-income borrowers do not have the ability to make the down payment required by banks. Lastly, the contact indicated that some banks in this AA are very good for low- and moderate-income borrowers and work with them by utilizing flexible underwriting standards.

State of Kansas

Wichita MSA

Demographic Information for Full-Scope Area: Wichita MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	124	9.68	33.87	25.81	30.65	0.00
Population by Geography	498,365	7.42	30.47	27.40	34.72	0.00
Owner-Occupied Housing by Geography	127,710	3.75	25.88	28.86	41.50	0.00
Businesses by Geography	25,619	12.59	23.10	27.50	36.81	0.00
Farms by Geography	838	2.98	13.60	31.03	52.39	0.00
Family Distribution by Income Level	125,002	21.25	18.14	20.81	39.80	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	49,235	11.36	45.57	25.24	17.83	0.00
Median Family Income = \$61,402		Median Housing Value = \$116,537				
HUD Adjusted Median Family Income for 2016 = \$66,400		Unemployment Rate = 3.92%				
Households Below the Poverty Level = 13%						

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

Source: 2010 U.S. Census and 2016 FFIEC updated MFI.

The Wichita MSA is comprised of four counties in Kansas (Butler, Harvey, Sedgwick, and Sumner). However, UMB limited its AA to the one county they were reasonably able to serve (Sedgwick County); this AA is referred to as the Wichita AA. UMB has two branches in the Wichita AA, one of which is in a low- income census tract and the other in an upper-income census tract.

The AA meets the requirement of the regulation and does not arbitrarily exclude low- and moderate-income geographies.

According to the 2010 U.S. Census, the population of the Wichita AA totaled 498,365. The distribution of families by income level was 21.25 percent low-income, 18.14 percent moderate-income, 20.81 percent middle-income, and 39.80 percent upper-income. According to the U.S. Census data, the AA consists of 124 census tracts, of which 12 were low income, 42 were moderate income, 32 were middle income, and 38 were upper income. The percentage of families in the AA living below the poverty level was high at 13.13 percent.

There is strong competition within the bank’s Wichita AA, with 41 total depository institutions. Competition includes large interstate banks, regional banks, savings bank, and community banks. UMB has two branches in the AA, and no deposit-taking ATMs. As of June 30, 2016, UMB’s deposits in the AA totaled \$136 million, which was 1.08 percent of the market. UMB ranked 14th out of 41 depository institutions. The top five depository institutions account for

73.53 percent of total deposits in the AA. The top five depository institutions included Bank of America, N.A., Intrust Bank, Fidelity Bank, Emprise Bank, and Commerce Bank.

Employment and Economic Factors

According to the Bureau of Labor Statistics, unemployment in this AA improved during the evaluation period, and is lower than the national average. The national unemployment rate as of December 2016 was 4.7 percent. The unemployment rate for the AA improved from 7.7 percent in January 2012 to 4.4 percent in December 2016.

In the Wichita AA, major industries include manufacturing, health and education services, government, retail trade, and professional and business services. According to Moody's Analytics, major employers include Spirit Aerosystems Inc., Textron Aviation, Via Christi Regional Medical Center, McConnell AFB, Koch Industries Inc., and Bombardier Aerospace.

Housing

According to the 2010 U.S. Census, 61.19 percent of the total housing units in the AA were owner occupied, and 30.24 percent were rental occupied units. Additionally, 3.75 percent of all owner occupied units and 14.42 percent of renter occupied units were located in low-income census tracts. While 25.88 percent of all owner occupied units and 44.45 percent of renter occupied units were located in moderate-income census tracts. Additionally, 7.73 percent of all single family (1-4 unit) homes and 14.03 percent of multifamily (5 plus unit) housing units were located in low-income census tracts. While 32.80 percent of all single family (1-4 unit) homes and 36.40 percent of multifamily (5 plus unit) housing units were located in moderate-income census tracts.

The Wichita MSA is a relatively high-cost housing area, limiting access to affordable home ownership among low- and moderate income residents. The median housing value in the AA is \$163,900, according to the 2016 Realtor.com data. The median housing value increased 27.15 percent from the 2012 level of \$128,900. One simplistic 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. Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$33,200 per year (or less than 50 percent of the 2016 FFIEC adjusted median family income in the AA) could afford a \$154,614 mortgage with a payment of \$830 per month. A moderate-income borrower making \$53,120 per year (or less than 80 percent of the 2016 FFIEC adjusted median family income in the AA) could afford a \$247,382 mortgage with a payment of \$1,328 per month.

This illustrates that a low-income borrower would be challenged to qualify for a mortgage loan in the AA with a value of \$163,900 and an estimated payment of \$880.

Community Contact

We contacted an economic development company that works to expand Wichita's commercial and industrial base through retention and expansion activities. The contact stated that the economic conditions in Wichita are stable, and that the area has a diverse mix of industries

providing a wide variety of products and services. The contact stated that approximately 97 percent of local businesses are considered small to medium in size, with less than 100 employees. The contact indicated that the financial institutions in the area are willing and eager to lend to help small businesses. In addition, the financial institutions work to help grow the economy and revitalize Wichita. Overall, the contact felt that the financial institutions are meeting the credit needs in the area, particularly through small business lending.

State of Missouri

Joplin MSA

Demographic Information for Full-Scope Area: Joplin MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	34	0.00	14.71	76.47	8.82	0.00
Population by Geography	175,518	0.00	12.99	80.87	6.14	0.00
Owner-Occupied Housing by Geography	45,388	0.00	10.37	82.11	7.52	0.00
Businesses by Geography	9,352	0.00	15.09	77.86	7.06	0.00
Farms by Geography	424	0.00	4.48	91.51	4.01	0.00
Family Distribution by Income Level	45,283	20.33	18.97	19.91	40.79	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	17,796	0.00	16.14	78.93	4.93	0.00
Median Family Income = \$46,381		Median Housing Value = \$96,160				
HUD Adjusted Median Family Income for 2016 = \$50,500		Unemployment Rate = 4.09%				
Households Below the Poverty Level = 17%						

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

The Joplin MSA AA consists of the entire counties of Jasper and Newton in Missouri. The Joplin MSA AA is located in southwestern Missouri. The AA meets the requirement of the regulation and does not arbitrarily exclude low- and moderate-income geographies. There are no low-income census tracts and five moderate-income census tracts in the Joplin MSA AA.

According to the 2010 U.S. Census, the total population of the AA was 175,518. The distribution of families by income level was 23.26 percent low income, 16.69 percent middle income, 18.23 percent middle income, and 41.82 percent upper income. The bank offers a full range of commercial and consumer loan/deposit products and services. Competition in the AA is high with 14 FDIC-insured depository institutions operating 81 offices. Competition also includes mortgage companies and credit unions. UMB has two branches in the AA with a deposit-taking ATM at each facility. One branch is located in a moderate-income census tract. As of June 30, 2016, UMB's deposits in the AA totaled \$135.5 million, which is 5.10 percent of the market.

The bank's deposits rank 8th out of 14 depository institutions; the top three depository institutions account for 51.79 percent of total deposits in the AA. The top three depository institutions include Southwest Missouri Bank, Arvest Bank, and U.S. Bank, N.A.

According to the 2016 Bureau of Labor Statistics, unemployment in the Joplin MSA AA for both Jasper and Newton Counties was 3.9 percent, which was lower than the state and national unemployment rates of 4.4 percent and 4.7 percent, respectively.

The percentage of families in the AA living below the poverty level is 17 percent. Families residing in moderate-income geographies that live below the poverty level total 23.95 percent. Moderate-income geographies account for 14.71 percent of the census tracts in the AA based on the 2010 U.S. Census.

According to Moody's Analytics, Joplin's manufacturing-centric economy is benefiting from strong domestic demand. The area is expected to grow faster than the state overall. Growth industries in the AA are food manufacturing, transportation logistics, and healthcare. The largest industries in the AA include food, fabricated metal and machinery manufacturing, transportation logistics, education and health services, retail trade, and government. The top five employers are Con-way Inc., Wal-Mart Stores, Mercy Hospital, Tri-State Motor Transit Co., and Downstream Casino Resort.

Housing

There are relatively limited opportunities for residential mortgage lending in the AA's moderate-income geographies due to the low number of units, the low rate for owner occupancy, and high poverty rate. Only 14 percent of total housing units are in low- and moderate-income geographies. According to the 2010 U.S. Census, 43.82 percent of the housing units in the moderate-income census tracts were owner occupied, 41.28 percent were rentals, and 14.89 percent were vacant.

The Joplin MSA is a relatively affordable home ownership area among low- and moderate-income residents. The median housing value in the AA is \$114,900, according to the 2016 Realtor.com data. The median housing value increased 4.45 percent from the 2012 level of \$110,000. One simplistic 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. Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$25,250 per year (or less than 50 percent of the 2016 FFIEC adjusted median family income in the AA) could afford a \$117,590 mortgage with a payment of \$631 per month. A moderate-income borrower making \$40,400 per year (or less than 80 percent of the 2016 FFIEC adjusted median family income in the AA) could afford an \$188,144 mortgage with a payment of \$1,010 per month.

This illustrates that low- and moderate-income borrowers would qualify for a mortgage loan in the AA with a value of \$114,900 and an estimated payment of \$617.

Community Contact

We reviewed one community contact with an economic development organization in the AA. Identified credit needs in the AA included mortgage and home improvement loans and small business financing and grants, particularly for startup businesses.

Missouri

Missouri non-MSA

Demographic Information for Full-Scope Area: Missouri non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	59	0.00	8.47	74.58	16.95	0.00
Population by Geography	247,431	0.00	5.65	70.62	23.74	0.00
Owner-Occupied Housing by Geography	69,783	0.00	5.23	72.43	22.34	0.00
Businesses by Geography	13,068	0.00	6.18	70.64	23.19	0.00
Farms by Geography	1,442	0.00	5.76	72.12	22.12	0.00
Family Distribution by Income Level	65,152	18.22	17.51	22.03	42.24	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	23,279	0.00	7.95	76.14	15.91	0.00
Median Family Income HUD Adjusted Median Family Income for 2016 Households Below the Poverty Level	= \$45,746 = \$49,700 = 16%	Median Housing Value Unemployment Rate				= \$103,172 = 3.60%

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

UMB’s Missouri non-MSA AA consists of the counties of Johnson, Pettis, Cooper, Henry, Benton, Barry, Lawrence, Linn, and Sullivan. According to the June 30, 2016 FDIC Summary of Deposits report, UMB had \$365 million in deposits within this AA. The bank ranked 1st in deposits with a market share of 9 percent. There were 117 deposit-taking institutions in the assessment area, in which UMB had 10 branches.

There is strong competition for deposits from banks. Some of the largest competition comes from Wells Fargo Bank, N.A., U.S. Bank, N.A., JP Morgan Chase, N.A., Cornerstone Mortgage and Pulaski Bank.

The 2010 US Census indicates the population of the MSA was 247,431 individuals. The Missouri non-MSA AA had 59 census tracts, which were designated as 8.47 percent moderate-income, 74.58 percent middle-income, and 16.95 percent upper-income; there were no low-income census tracts.

Employment and Economic Factors

According to the Bureau of Labor Statistics, during December 2012, the unemployment rates in the counties of Johnson, Lawrence, Barry, Linn, Sullivan, Pettis, Benton, Henry and Cooper were 7.4 percent; 6.5 percent; 6.8 percent; 8.8 percent; 6.3 percent; 6.5 percent; 8.5 percent; 7.4 percent and 7.6 percent, respectively. Over the subsequent five years, unemployment percentages have decreased. As of December of 2016, unemployment rates in the counties of

Johnson, Lawrence, Barry, Linn, Sullivan, Pettis, Benton, Henry and Cooper were 4.3 percent; 3.7 percent; 4.0 percent; 6.5 percent; 5.0 percent; 4.3 percent; 5.8 percent; 4.5 percent and 4.1 percent, respectively. The Missouri non-MSA average unemployment rates have been lower than the national averages, which are reflective of a stable economy. The Bureau of Labor Statistics indicates the national unemployment rate was 8.3 percent in December of 2012 and 4.9 percent in December of 2016.

Johnson County's seat is Warrensburg and is located in the western portion of the state. As of the 2010 census, the population was 52,595. Top industries include the Federal Government-National Security, schools, restaurants, hospitals, manufacturers, department stores, and long-term care and assisted living facilities.

Pettis County's seat is Sedalia. As of the 2010 census, the population was 42,201. The county is a regional business center that demonstrates a proven record for business development. Pettis County has advanced utility and telecommunication infrastructure, available buildings, and fully developed industrial parks. Key employers include 3M, ConAgra, Coreslab Structures, Ditzfeld Transfer, Duke Manufacturing, DuPont Pioneer, EnerSys, and GE Energy.

Benton County's largest city is Warsaw. As of the 2010 census, the population was 19,056 and the top industries include retail trade, farming, construction, food services and federal/military.

Henry County's seat is Clinton, MO and is located in the western portion of the state. As of the 2010 census, the population was 22,272 and the top industries include recycling plants and warehousing companies.

Cooper County's seat is Boonville. As of the 2010 census, the population was 17,647. The most common industries include administrative, sales, management, production, and transportation. The Kemper Military School is located in Boonville, MO and is known as the "Westpoint of the West".

Lawrence County's seat is Mount Vernon, MO. As of the 2010 census, the population was 38,634. Top employers include the International Paper Company, Lawrence County Schools, Wal-Mart Stores, the Lawrence County Medical Center, and the County of Lawrence.

Linn County's seat is Linneus, MO. The county's population, as of the 2010 census was 12,401. The most common jobs are administrative, production, and sales. Linn County has an unusually high number of jobs related to farming, fishing and forestry. The highest paid jobs within this county are management, transportation, and health practitioners.

Sullivan County's seat is Milan, MO. According to the 2010 census, the total population was 6,714. The most common jobs are production, administrative, and management.

Housing

According to the 2010 U.S. Census, 60.55 percent of the total housing units in the AA were owner-occupied, and 23.27 percent were rental occupied units. The AA did not have any low-income census tracts. Consequently, 5.23 percent of all owner occupied units and 7.0 percent

of renter occupied units were located in moderate-income census tracts. The median housing value was \$103,172 and the median monthly gross rent was \$591. Homeowners and renters with home-related costs that exceed 30.00 percent of their income totaled 13.14 and 9.32 percent, respectively.

The Missouri non-MSA is a relatively high-cost housing area, limiting access to affordable home ownership among low- and moderate-income residents. The median housing value in the AA is \$116,100, according to the 2016 Zillow.com data. The median housing value increased 6.93 percent from the 2012 level of \$108,580. One simplistic 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. Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$24,850 per year (or less than 50 percent of the 2016 FFIEC adjusted median family income in the AA) could afford a \$115,727 mortgage with a payment of \$621 per month. A moderate-income borrower making \$39,760 per year (or less than 80 percent of the 2016 FFIEC adjusted median family income in the AA) could afford an \$185,164 mortgage with a payment of \$994 per month.

This illustrates that a low-income borrower would be slightly challenged to qualify for a mortgage loan in the AA with a value of \$116,000 and an estimated payment of \$623.

Community Contacts

Several community contacts were performed in this AA. The community contacts identified access to credit, especially low- and moderate-income who cannot obtain it; financial literacy seminars to give low- and moderate-income access to homeownership classes in order for them to build credit ratings; affordable housing, even though the housing stock is lacking. The contacts further stated innovative and flexible products are needed to help accommodate some low- and moderate-income, and more industries need to be created to generate more jobs for low- and moderate-income. Lastly, additional capital for small business start-ups is needed. There are opportunities for financial institution's involvement in addressing the aforementioned community needs, within this area; however, given the number of banks serving the AA, competition for community activities is strong.

Missouri

Springfield MSA

Demographic Information for Full-Scope Area: Springfield MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	76	3.95	25.00	50.00	21.05	0.00
Population by Geography	352,596	2.86	18.27	54.33	24.54	0.00
Owner-Occupied Housing by Geography	91,308	0.62	15.28	55.96	28.14	0.00
Businesses by Geography	21,517	0.96	26.48	49.67	22.88	0.00
Farms by Geography	738	0.41	8.81	67.62	23.17	0.00
Family Distribution by Income Level	90,534	18.37	17.65	22.16	41.82	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	32,612	2.60	28.00	54.97	14.44	0.00
Median Family Income = \$52,463		Median Housing Value = \$129,342				
HUD Adjusted Median Family Income for 2016 = \$55,900		Unemployment Rate = 3.38%				
Households Below the Poverty Level = 15%						

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

The Springfield MSA AA consists of the counties of Christian and Greene in Missouri, which is a portion of the five-county Springfield, MO MSA. The Springfield MSA is located in southwestern Missouri. This AA is reasonable given the bank's branch network; it would be difficult to serve all five counties that make up the MSA. The AA meets the requirement of the regulation and does not arbitrarily exclude low- and moderate-income geographies. There are three low-income census tracts and 19 moderate-income census tracts in the Springfield MSA AA.

According to the 2010 U.S. Census, the total population of the AA was 352,596. The distribution of families by income level was 18.37 percent low income, 17.65 percent moderate income, 22.16 percent middle income, and 41.82 percent upper income, respectively. The bank offers a full range of commercial and consumer loan/deposit products and services. Competition in the AA is high with 39 FDIC-insured depository institutions operating offices. Competition also includes mortgage companies and credit unions. During the evaluation period, UMB had three branches in the AA with a deposit-taking ATM at each facility. All three branches were located in moderate-income census tracts. One branch was closed in January 2017. As of June 30, 2016, UMB's deposits in the AA totaled \$144.6 million, which is 1.82 percent of the market. The bank's deposits rank 15th out of 34 depository institutions; the top three depository institutions account for 42.04 percent of total deposits in the AA. The top three depository institutions were Great Southern Bank, Commerce Bank, and Central Bank of The Ozarks.

Employment and Economic Factors

According to the Bureau of Labor Statistics, unemployment in the Springfield MSA AA for Christian County is 3.4 percent and Greene County is 3.3 percent. This is lower than the state and national unemployment rates of 4.4 percent and 4.7 percent, respectively, in December 2016. Unemployment in Christian and Greene Counties has fallen from 6.7 percent and 6.3 percent, respectively, in January 2012. Similarly, state and national unemployment rates have fallen from 7.3 percent and 8.3 percent, respectively, for the same period.

The percentage of families in the AA living below the poverty level is 15 percent. Families residing in low-income geographies that live below the poverty level total 43.05 percent. Families residing in moderate-income geographies that live below the poverty level total 22.63 percent. Low-income geographies account for 3.95 percent and moderate-income geographies account for 25.00 percent of the census tracts in the AA based on the 2010 U.S. Census.

According to Moody's Analytics, Springfield's economy is expanding at a healthy pace and is one of Missouri's top performing areas. Growth industries in the AA are healthcare, education, and government. The largest industries in the AA include education and health services, government, professional and business services, retail trade, and leisure and hospitality services. The top five employers are Mercy Hospital, CoxHealth Systems, Wal-Mart Stores, Bass Pro Shops, and Missouri State University.

Housing

There are relatively limited opportunities for residential mortgage lending in the AA's low- and moderate-income geographies due to the low number of units, the low rate for owner occupancy, and high poverty rate. Only 24 percent of total housing units are in low- and moderate-income geographies. According to the 2010 U.S. Census, housing units in low-income census tracts were 13.07 percent owner occupied, 69.71 percent rentals, and 17.22 percent vacant. Housing units in moderate-income census tracts were 43.78 percent owner occupied, 45.79 percent rentals, and 10.42 percent vacant. The weighted average monthly gross rent was \$644. According to Moody's Analytics, housing demand in the AA is lackluster, with housing prices rising more slowly than the U.S. average and keeping housing starts down.

The median housing value in the AA is \$129,500, according to the 2015 U.S. Census American Community Survey. One simplistic 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. Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$27,949 per year (or less than 50 percent of the 2016 FFIEC adjusted median family income in the AA) could afford a \$130,211 mortgage with a payment of \$699 per month. This illustrates that a low-income borrower could qualify for a mortgage loan in the AA, but may be challenged when accounting for the additional expenses that come with homeownership, such as down payment, homeowners insurance, and real estate taxes.

The Springfield MSA is a relatively high-cost housing area, limiting access to affordable home ownership among low-income borrowers. The median housing value in the AA is \$164,900,

according to the 2016 Realtor.com data. One simplistic 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. Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$27,950 per year (or less than 50 percent of the 2016 FFIEC adjusted median family income in the AA) could afford a \$130,164 mortgage with a payment of \$699 per month. This illustrates that a low-income borrower would be challenged to qualify for a mortgage loan in the AA. The median housing value in the AA is \$128,500 and \$164,900 in 2012 and 2016 reflecting a percent change of 28.33 percent from 2012 to 2016 according to Realtor.com data.

Community Contact

We performed three community contacts in the AA. Contacts included an economic development organization, an affordable housing organization, and an agricultural business education organization. Identified credit needs include low-income rental housing, small dollar loan programs as an alternative to payday lenders, and loans to young farmers. Other community needs included financial literacy education for low and moderate income individuals.

Nebraska

Omaha MSA

Demographic Information for Full-Scope Area: Omaha MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	156	17.95	21.79	32.69	26.92	0.64
Population by Geography	517,110	13.75	22.56	33.67	29.52	0.50
Owner-Occupied Housing by Geography	127,698	8.95	18.49	37.97	34.58	0.00
Businesses by Geography	33,315	8.83	19.34	37.93	33.25	0.65
Farms by Geography	916	4.16	13.32	45.79	36.63	0.10
Family Distribution by Income Level	123,927	22.77	17.24	21.35	38.64	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	49,586	24.20	29.93	32.71	13.16	0.00
Median Family Income = \$69,538		Median Housing Value = \$146,775				
HUD Adjusted Median Family Income for 2016 = \$72,800		Unemployment Rate = 3.35%				
Households Below the Poverty Level = 12%						

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

The bank delineated the entire Omaha MSA as its AA. The Omaha MSA is located in central eastern Nebraska. For the 2010 census periods, the MSA consisted of Douglas County. The AA meets the requirement of the regulation and does not arbitrarily exclude low- and moderate-income geographies.

According to the 2010 U.S. Census, the total population of the MSA was 517,110. The distribution of families by income level was 12.25 percent low-income, 19.80 percent moderate-income, 35.84 percent middle-income, and 32.11 percent upper-income, respectively.

The bank offers a full range of commercial and consumer loan/deposit products and services. Competition in the AA is high with 35 FDIC-insured depository institutions operating 187 offices. Competition includes large interstate banks, regional banks, and community banks. UMB has one branch in the AA with a deposit-taking ATM. As of June 30, 2016, UMB's deposits in the AA totaled \$177 million, which is 0.69 percent of the market. The bank's deposits rank 14th out of 35 depository institutions; the top five depository institutions account for 77.65 percent of total deposits in the AA. The top five depository institutions include First National Bank of Omaha, Mutual of Omaha Bank, Wells Fargo Bank, N.A., US Bank, N.A., and Bank of the West.

Employment and Economic Factors

According to the Bureau of Labor Statistics, unemployment in the Omaha MSA improved during the evaluation period. Unemployment in the MSA fell from 5.0 percent in January 2012 to 3.3 percent in December 2016. At 3.3 percent in December 2016, it remains lower than the national unemployment rate of 4.7 percent. Similarly, unemployment in the state of Nebraska fell from 4.1 percent to 3.3 percent during the same time.

The percentage of families in the AA living below the poverty level is moderate at 12 percent based on the 2010 U.S. Census. Over 28 percent of families residing in low-income and almost 15 percent of families residing in moderate-income geographies live below the poverty level. Low and moderate-income geographies account for 39.74 percent of the census tracts in the AA based on the 2010 U.S. Census.

According to Moody's Analytics, the largest industries in the MSA include management of companies and enterprises, federal government, offices of physicians and computer systems design and related services. The top five employers are Offutt Air Force Base, CHI Health, Nebraska Medical Center, The Methodist Health System, and First Data.

Housing

According to the 2010 U.S. Census, 41.96 percent of the housing units in low- and moderate-income census tracts were owner occupied, 45.50 percent were rentals, and 12.54 percent were vacant.

The Omaha MSA is a relatively high-cost housing area, limiting access to affordable home ownership. The 2016 median housing value in the AA is \$219,000, according to the 2016 Realtor.com data. The median housing value increased 51.03 percent from the 2012 level of \$145,000. One simplistic 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. Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$36,400 per year (or less than 50 percent of the 2016 FFIEC adjusted median family income in the AA) could afford a \$169,516 mortgage with a payment of \$910 per month. A moderate-income borrower making \$58,240 per year (or less than 80 percent of the 2016 FFIEC adjusted median family income in the AA) could afford a \$271,226 mortgage with a payment of \$1,456 per month. This illustrates that low income borrowers would be challenged to qualify for a mortgage loan in the AA with a value of \$219,000 and an estimated payment of \$1,176.

Community Contact

We contacted a community organization in the Omaha area. The community contact provides low-interest rate financing for residential rental properties, housing rehabilitation, and homeownership benefiting low- and moderate-income families. The community contact stated banks seem to be averse to extending mortgage credit to low- and moderate-income borrowers and attributed that to the tightening of credit underwriting by financial institutions following the recession. The community contact believed that many banks have yet to relax their tightened underwriting standards, exacerbating access to affordable mortgage credit for low- and moderate-income borrowers. The contact also mentioned that while banks have seemingly tightened their mortgage underwriting criteria, they remain active in homebuyer

assistance efforts to help better prepare low- and moderate-income borrowers for home ownership. The contact stated that many banks in the AA provide grant funding to housing counseling agencies. Additionally, the contact stated that local banks in the AA continue to work with organizations, such as the contact, to provide mortgage financing along with down payment and closing cost assistance in an effort to make homeownership attainable for low- and moderate-income families. In addition, the contact mentioned many banks were active with the FHLB affordable housing programs.

The contact mentioned opportunity for banks to join a housing collaborative known as Omaha 100. Omaha 100 is made up of several banks who provide mortgage credit to low- and moderate-income borrowers and the contact stated that having more banks participate could increase the opportunity of homeownership for low- and moderate-income families.

State of Oklahoma

Oklahoma City MSA

Demographic Information for Full-Scope Area: Oklahoma City MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	241	12.45	32.37	31.12	22.82	1.24
Population by Geography	718,633	9.20	32.08	30.42	28.17	0.13
Owner-Occupied Housing by Geography	172,276	5.61	25.15	34.33	34.91	0.01
Businesses by Geography	57,033	8.17	24.01	31.27	34.64	1.90
Farms by Geography	1,170	4.79	20.85	31.28	42.65	0.43
Family Distribution by Income Level	173,643	24.44	18.46	19.47	37.64	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	74,489	14.41	43.72	28.70	13.17	0.00
Median Family Income = \$58,775		Median Housing Value = \$120,034				
HUD Adjusted Median Family Income for 2016 = \$64,500		Unemployment Rate = 3.18%				
Households Below the Poverty Level = 15%						

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

The bank delineated the county of Oklahoma, Oklahoma (OKCO). This is a subset of the Oklahoma City, Oklahoma MSA. The AA is located in central Oklahoma.

According to the June 30, 2016 FDIC Summary of Deposit report, UMB had \$194,548 in deposits in the AA. UMB’s deposit market share in the AA was 0.85 percent. There are 54 deposit-taking institutions in the AA with a total of 242 branches. UMB operates four branches and two deposit-taking ATMs in the AA. There is strong competition for deposits from large national banks and regional banks. Some of the largest competition comes from JPMorgan Chase Bank, N.A., Bank of Oklahoma, N.A., MidFirst Bank, BancFirst, and Bank of America, N.A.

Employment and Economic Factors

According to the Bureau of Labor Statistics, this region had a 5.40 percent unemployment rate in January 2012. Over the subsequent five years, unemployment percentages have decreased. The unemployment rate in December 2013 was 5.10 percent, and fell to 4.10 percent in December 2014. The unemployment rate in December 2016 fell to 4.00 percent. The OKCO AA unemployment rate has been consistently lower than the national averages throughout this evaluation period. The Bureau of Labor Statistics indicates the national unemployment rate was 8.30 percent in January 2012, 5.10 percent in December 2013, 5.60 in December 2014, 5.00 in December 2015, and 4.70 percent in December 2016.

According to Moody's Analytics, Oklahoma City's relative cost of doing business is 87.00 percent of the national average. The low cost structure will help attract new businesses and residents, and the metro area will perform on par with the nation in job and income growth. However, energy weaknesses hamper progress in goods and private services.

The top five employment sectors in Oklahoma City were government, education and health services, professional and business services, leisure and hospitality services, and retail trade. The top five employers in Oklahoma City were Tinker Air Force Base, University of Oklahoma-Norman, FAA Mike Monroney Aeronautical Center, Integris Health, and Hobby Lobby Stores, Inc.

Housing

Owner occupied units made up 54.24 percent of the housing, and total rental units made up 33.74 percent of units in the OKCO AA in 2016. Nearly 42.50 percent (42.46) of the housing units in the OKCO AA were in low- and moderate-income census tracts. Of the 241 census tracts, 44.81 percent are considered low- and moderate-income. The 2010 US Census indicated the median housing value was \$120,034. Since that time, the median housing value increased approximately 11.14 percent based on the 2015 US Census American Community Survey. The 2010 US Census indicates the weighted average monthly gross rent for OKCO AA was \$689.

The Oklahoma City MSA is a relatively high-cost housing area, limiting low- and moderate-income access to affordable home ownership. The 2016 median housing value in this AA is \$218,500, according to the 2016 Realtor.com data. The median housing value increased 40.97 percent from the 2012 level of \$155,000. One simplistic 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. Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$32,250 per year (or less than 50 percent of the 2016 FFIEC adjusted median family income in the AA) could afford a \$150,190 mortgage with a payment of \$806 per month. A moderate-income borrower making \$51,600 per year (or less than 80 percent of the 2016 FFIEC adjusted median family income in the AA) could afford a \$240,303 mortgage with a payment of \$1,290 per month. This illustrates that a low-income borrowers would be challenged to qualify for a mortgage loan in the AA with a value of \$218,500 and an estimated payment of \$1,173.

Community Contacts

We performed three community contacts in the Oklahoma City AA. There are many opportunities for financial institution involvement in the AA, and the banks have been responsive. The three community contacts considered for this evaluation indicated the following needs: more participation in dollars committed and the number of bank partnerships established; and increased opportunities for affordable housing. Our contacts included leaders from various local non-profit organizations, and other community service providers.

State of Texas

Dallas MD

Demographic Information for Full-Scope Area: Dallas MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	818	13.33	25.06	24.69	36.55	0.37
Population by Geography	3,813,094	11.85	25.21	26.19	36.75	0.00
Owner-Occupied Housing by Geography	793,448	5.45	19.40	27.57	47.58	0.00
Businesses by Geography	331,716	8.20	17.57	24.39	49.61	0.24
Farms by Geography	5,815	5.98	16.66	29.82	47.46	0.07
Family Distribution by Income Level	898,731	23.34	16.53	17.86	42.27	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	358,545	21.18	36.69	25.72	16.41	0.00
Median Family Income = \$67,175		Median Housing Value = \$177,540				
HUD Adjusted Median Family Income for 2016 = \$70,500		Unemployment Rate = 3.57%				
Households Below the Poverty Level = 12%						

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

The Dallas MD is comprised of three counties (Collin, Dallas, and Denton,). UMB has four branches in the Dallas AA, one in a low-income census tract, two in middle-income census tracts, and one in an upper-income census tract. The AA meets the requirement of the regulation and does not arbitrarily exclude low- and moderate income geographies.

According to the 2010 U.S. Census, the population of the Dallas AA totals 3,813,094. The distribution of families by income level was 23.34 percent low-income, 16.53 percent moderate-income, 17.86 percent middle-income, and 42.2 percent upper-income. According to the U.S. Census data, the AA consists of 818 census tracts, of which 109 are low income, 205 are moderate income, 202 are middle income, 299 are upper income, and 3 are unclassified. The percentage of families in the AA living below the poverty level is 11.97 percent.

There is strong competition within the bank’s Dallas MD, with 121 total depository institutions. Competition includes large interstate banks, regional banks, savings bank, and community banks. UMB has four branches and two deposit-taking ATMs in this AA. As of June 30, 2016, UMB’s deposits in the AA totaled \$196 million, which is 0.10 percent of the market. UMB ranks 48th out of 121 depository institutions. The top five depository institutions account for 72.53 percent of total deposits in the AA. The top five depository institutions were Bank of America N.A., JPMorgan Chase Bank, N.A., Texas Capital Bank, Wells Fargo Bank, N.A., and Compass Bank.

Employment and Economic Factors

According to the Bureau of Labor Statistics, unemployment in this AA improved during the evaluation period, and is lower than the national average. The national unemployment rate as of December 2016 was 4.7 percent. For Collin County, the rate improved from 5.4 percent in January 2013 to 3.4 percent in December 2016. For Denton and Dallas Counties, the rates improved from 5.2 percent and 6.5 percent to 3.4 percent and 3.8 percent, respectively.

In Dallas County, major industries include professional and business services, healthcare and education services, government, retail trade, and hospitality services. According to Moody's Analytics, major employers in Dallas County include Wal-Mart Stores, Inc., Bank of America, N.A., Carlson Restaurants Worldwide, Texas Health Resources, Baylor Health Care System, AT&T, JPMorgan Chase, N.A., and Texas Instruments.

In Denton County, major industries include education, government, and healthcare. According to the Denton County website, major employers include University of North Texas, Denton School District, Wal-Mart Stores, Inc., Peterbuilt Motors, Inc., Lewisville School District, and Northwest School District.

In Collin County, major industries include scientific and technical services, retail trade, healthcare, and manufacturing. According to the Collin County Business Alliance, major employers include Texas Instruments, HP Enterprise Services, J.C. Penney, Nortel, Frito-Lay, Blue Cross Blue Shield, Verizon, and AT&T.

Housing

According to the 2010 U.S. Census, 54.27 percent of the total housing units in the AA were owner occupied, and 36.38 percent are rental occupied units. Additionally, only 5.45 percent of all owner occupied units and 21.19 percent of renter occupied units were located in low-income census tracts. While 19.40 percent of all owner occupied units and 29.81 percent of renter occupied units were located in moderate-income census tracts. Additionally, 7.70 percent of all single family (1-4 unit) homes and 24.19 percent of multifamily (5 plus unit) housing units were located in low-income census tracts. While 22.44 percent of all single family (1-4 unit) homes and 27.76 percent of multifamily (5 plus unit) housing units were located in moderate-income census tracts.

The Dallas MD is a relatively high-cost housing area, limiting access to affordable home ownership among low and moderate-income borrowers. The 2016 median housing value in the AA is \$334,200, according to the 2016 Realtor.com data. The median housing value increased 76.83 percent from the 2012 level of \$189,000. One simplistic 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. Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$35,250 per year (or less than 50 percent of the 2016 FFIEC adjusted median family income in the AA) could afford a \$164,161 mortgage with a payment of \$881 per month. A moderate-income borrower making \$56,400 per year (or less than 80 percent of the 2016 FFIEC adjusted median family income in the AA) could afford a \$262,657 mortgage with a payment of \$1,410 per month. This illustrates that low and moderate-income borrowers would be challenged to

qualify for a mortgage loan in the AA with a value of \$334,200 and estimated payment of \$1,794.

Community Contact

We contacted a non-profit community development corporation that provides neighborhood revitalization, primarily through the development of affordable housing. The community development corporation provides several social service programs to qualified low- to moderate-income persons, including homebuyer training, credit education, and financial literacy training. The community development contact cited a need for retail business development in the South Dallas area. Specifically, the contact cited a need for bank involvement in post-purchase counseling for homebuyers, funding for development of vacant land, and funding to encourage neighborhood-oriented retail development.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank, if applicable, over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the

bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the

table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

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

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

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

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

Tables of Performance Data

Kansas City MO-KS MMSA

St. Louis MMSA

State of Arizona

State of Colorado

State of Kansas

State of Missouri

State of Nebraska

State of Oklahoma

State of Texas

Table 1. Lending Volume

LENDING VOLUME		Geography: Multistate MSAs						Evaluation Period: January 1, 2012 TO December 31, 2016				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Kansas City MMSA	100.00	2,215	418,755	3,477	752,565	56	9,852	88	316,593	5,836	1,497,765	100.00
St. Louis MMSA	100.00	567	188,061	1,726	387,235	6	557	56	185,898	2,355	761,751	100.00

* Loan Data as of December 31, 2016. Rated area refers to either the state or multi-state MA rating area.
 ** The evaluation period for Community Development Loans is June 04, 2012 to December 31, 2016.
 *** Deposit Data as of June 30, 2016. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: Multistate MSAs				Evaluation Period: January 1, 2012 TO December 31, 2016					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Kansas City MMSA	835	83.58	5.51	2.51	18.56	14.13	37.17	31.86	38.76	51.50	0.40	0.15	0.48	0.35	0.43	
St. Louis MMSA	164	16.42	4.94	0.00	16.45	9.76	41.93	46.95	36.69	43.29	0.07	0.00	0.10	0.07	0.07	

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: Multistate MSAs				Evaluation Period: January 1, 2012 TO December 31, 2016					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total*	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Kansas City MMSA	70	79.55	5.51	4.29	18.56	15.71	37.17	31.43	38.76	48.57	0.43	0.00	0.29	0.34	0.56	
St. Louis MMSA	18	20.45	4.94	11.11	16.45	33.33	41.93	22.22	36.69	33.33	0.14	0.00	0.39	0.07	0.14	

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE												Geography: Multistate MSAs					Evaluation Period: January 1, 2012 TO December 31, 2016				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp						
Full Review:																					
Kansas City MMSA	1,300	77.47	5.51	3.00	18.56	11.54	37.17	33.69	38.76	51.77	0.59	2.00	0.54	0.62	0.55						
St. Louis MMSA	378	22.53	4.94	1.85	16.45	13.23	41.93	36.77	36.69	48.15	0.14	0.00	0.29	0.14	0.11						

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: Multistate MSAs						Evaluation Period: January 1, 2012 TO December 31, 2016					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies								
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp		
Full Review:																	
Kansas City MMSA	10	58.82	15.45	10.00	31.17	60.00	29.33	30.00	24.05	0.00	0.46	0.00	0.00	1.75	0.00		
St. Louis MMSA	7	41.18	13.30	0.00	19.47	28.57	38.31	14.29	28.92	57.14	0.29	0.00	0.00	0.00	1.37		

* Based on 2015 Peer Mortgage Data: US and PR.

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 2000 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: Multistate MSAs		Evaluation Period: January 1, 2012 TO December 31, 2016				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*							
	#	% of Total*	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Over all	Low	Mod	Mid	Upp	
Full Review:																		
Kansas City MMSA	3,335	65.99	6.92	8.55	19.07	19.85	31.13	33.16	41.05	38.44	2.41	2.88	2.45	2.67	2.10			
St. Louis MMSA	1,719	34.01	6.28	11.05	16.12	21.35	36.01	29.84	41.46	37.75	0.76	1.59	1.17	0.70	0.57			

* Based on 2015 Peer Small Business Data: US and PR.

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

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

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS												Geography: Multistate MSAs					E valuation Period: January 1, 2012 TO December 31, 2016				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp				
Full Review:																					
Kansas City MMSA	56	90.32	3.15	0.00	14.43	3.57	41.76	67.86	40.31	28.57	3.25	0.00	8.33	3.00	3.28						
St. Louis MMSA	6	9.68	1.93	0.00	11.89	0.00	43.84	83.33	42.26	16.67	0.22	0.00	0.00	0.43	0.00						

* Based on 2015 Peer Small Business Data: US and PR.

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

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

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: Multistate MSAs						Evaluation Period: January 1, 2012 TO December 31, 2016							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
Kansas City MMSA	332	85.35	20.05	12.62	17.36	22.33	21.24	22.65	41.35	42.39	0.45	0.49	0.48	0.37	0.48
St. Louis MMSA	57	14.65	20.94	6.00	16.70	20.00	20.74	26.00	41.61	48.00	0.08	0.04	0.09	0.10	0.08

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

**** As a percentage of loans with borrower income information available. No information was available for 7.70% of loans originated and purchased by Bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: Multistate MSAs						Evaluation Period: January 1, 2012 TO December 31, 2016						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
Kansas City MMSA	34	79.07	20.05	20.69	17.36	34.48	21.24	10.34	41.35	34.48	0.40	0.55	1.50	0.17	0.09
St. Louis MMSA	9	20.93	20.94	11.11	16.70	44.44	20.74	11.11	41.61	33.33	0.16	0.00	0.53	0.14	0.07

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

**** As a percentage of loans with borrower income information available. No information was available for 11.60% of loans originated and purchased by Bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: Multistate MSAs						Evaluation Period: January 1, 2012 TO December 31, 2016						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [*]				
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	Over all	Low	Mod	Mid	Upp
Full Review:															
Kansas City MMSA	381	72.99	20.05	12.54	17.36	19.09	21.24	24.50	41.35	43.87	0.78	1.05	0.63	0.92	0.,72
St. Louis MMSA	141	27.01	20.94	13.08	16.70	26.92	20.74	21.54	41.61	38.46	0.19	0.27	0.23	0.19	0.16

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

**** As a percentage of loans with borrower income information available. No information was available for 7.90% of loans originated and purchased by Bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: Multistate		Evaluation Period: January 1, 2012 TO December 31, 2016		
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Kansas City MMSA	3,477	66.83	81.48	31.84	56.66	14.81	28.53	2.41	1.57
St. Louis MMSA	1,726	33.17	80.37	31.58	50.29	18.42	31.29	0.76	0.47

* Based on 2015 Peer Small Business Data: US and PR.

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

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

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 13.40% of small loans to businesses originated and purchased by the Bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS				Geography: Multistate MSAs		Evaluation Period: January 1, 2012 TO December 31, 2016			
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Kansas City MMSA	56	90.32	95.18	62.50	41.07	28.57	30.36	3.25	5.56
St. Louis MMSA	6	9.68	95.60	50.00	66.67	16.67	16.67	0.22	0.00

* Based on 2015 Peer Small Business Data: US and PR.

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

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

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 22.58% of small loans to farms originated and purchased by Bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: Multistate MSAs				Evaluation Period: June 4, 2012 TO December 31, 2016			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Kansas City MMSA	8	4,838	281	45,182	289	50,019	100.00	1	1,027
St. Louis MMSA	3	993	242	19,631	245	20,624	100.00	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 institution's financial reporting system.

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: Multistate MSAs Evaluation Period: June 4, 2012 TO March 27, 2017																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Kansas City MMSA	100.00	31	67.39	9.68	22.58	41.94	25.81	1	8	-1	-2	-2	-2	8.62	21.93	35.00	34.43
St. Louis MMSA	100.00	15	32.61	0.00	26.67	33.33	40.00	0	7	-1	0	-3	-3	8.67	18.31	39.43	33.53

Table 1. Lending Volume

LENDING VOLUME		Geography: Arizona				Evaluation Period: January 1, 2013 TO December 31, 2016						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Phoenix MSA	100.00	111	51,115	446	141,222	5	629	18	72,031	580	264,997	100.00

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

** The evaluation period for Community Development Loans is January 01, 2013 to December 31, 2016.

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

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: Arizona				Evaluation Period: January 1, 2013 TO December 31, 2016					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Phoenix MSA	38	100.00	3.61	0.00	20.72	2.63	35.76	7.89	39.91	89.47	0.01	0.00	0.00	0.00	0.02	

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT												Geography: Arizona		Evaluation Period: January 1, 2013 TO December 31, 2016				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*							
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp			
Full Review:																		
Phoenix MSA	9	100.00	3.61	11.11	20.72	11.11	35.76	22.22	39.91	55.56	0.02	0.00	0.00	0.00	0.04			

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE												Geography: Arizona					Evaluation Period: January 1, 2013 TO December 31, 2016				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp						
Full Review:																					
Phoenix MSA	62	100.00	3.61	3.23	20.72	3.23	35.76	14.52	39.91	79.03	0.02	0.00	0.02	0.00	0.03						

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: Arizona				Evaluation Period: January 1, 2013 TO December 31, 2016					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans					
Full Review:															
Phoenix MSA	2	100.00	15.31	50.00	37.05	50.00	28.83	0.00	18.81	0.00	0.29	1.39	0.00	0.00	0.00

* Based on 2015 Peer Mortgage Data: US and PR.

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: Arizona		Evaluation Period: January 1, 2013 TO December 31, 2016				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*							
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Over all	Low	Mod	Mid	Upp			
Full Review:																		
Phoenix MSA	441	100.00	6.51	18.14	15.38	23.81	29.41	22.22	48.12	35.83	0.13	0.25	0.00	0.09	0.11			

* Based on 2015 Peer Small Business Data: US and PR.

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

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

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS												Geography: Arizona		valuation Period: January 1, 2013 TO December 31, 2016		
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Over all	Low	Mod	Mid	Upp	
Full Review:																
Phoenix MSA	5	100.00	5.46	0.00	15.54	0.00	31.98	80.00	46.60	20.00	0.70	0.00	0.00	2.11	0.00	

* Based on 2015 Peer Small Business Data: US and PR.

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

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

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: Arizona					Evaluation Period: January 1, 2013 TO December 31, 2016					Market Share*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Over all	Low	Mod	Mid	Upp	
Full Review:																
Phoenix MSA	25	100.00	20.93	0.00	17.44	4.55	20.15	4.55	41.48	90.91	0.01	0.00	0.01	0.00	0.02	

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

**** As a percentage of loans with borrower income information available. No information was available for 12.00% of loans originated and purchased by Bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: Arizona				Evaluation Period: January 1, 2013 TO December 31, 2016					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Over all	Low	Mod	Mid	Upp	
Full Review:																
Phoenix MSA	8	100.00	20.93	0.00	17.44	33.33	20.15	0.00	41.48	66.67	0.02	0.00	0.00	0.00	0.03	

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

**** As a percentage of loans with borrower income information available. No information was available for 25.00% of loans originated and purchased by Bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: Arizona						Evaluation Period: January 1, 2013 TO December 31, 2016							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [*]				
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	Over all	Low	Mod	Mid	Upp
Full Review:															
Phoenix MSA	39	100.00	20.93	3.03	17.44	15.15	20.15	12.12	41.48	69.70	0.02	0.00	0.01	0.02	0.04

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

**** As a percentage of loans with borrower income information available. No information was available for 15.40% of loans originated and purchased by Bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES				Geography: Arizona		Evaluation Period: January 1, 2013 TO December 31, 2016			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Phoenix MSA	446	100.00	87.30	16.59	38.57	20.18	41.26	0.13	0.03

* Based on 2015 Peer Small Business Data: US and PR.

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

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

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 18.83% of small loans to businesses originated and purchased by the Bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS				Geography: Arizona		Evaluation Period: January 1, 2013 TO December 31, 2016			
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Phoenix MSA	5	100.00	93.47	40.00	80.00	0.00	20.00	0.70	0.00

* Based on 2015 Peer Small Business Data: US and PR.

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

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

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

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: Arizona				Evaluation Period: January 1, 2013 TO December 31, 2016			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Phoenix MSA	0	0	25	4,802	25	4,802	100.00	0	0
Statewide	0	0	1	1	1	1	0.00	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 institution's financial reporting system.

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: Arizona Evaluation Period: January 1, 2013 TO March 27, 2017																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Phoenix MSA	100.00	7	100.00	0.00	0.00	71.43	28.57	10	3	0	0	+5	+2	8.42	24.46	33.25	33.69

Table 1. Lending Volume

LENDING VOLUME		Geography: Colorado				Evaluation Period: January 1, 2013 TO December 31, 2016						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Denver MSA	83.08	279	115,389	1,760	368,152	9	632	57	196,864	2,106	681,037	77.40
Limited Review:												
Colorado Springs MSA	16.92	109	22,102	306	55,343	2	500	8	17,640	425	95,405	22.60

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

** The evaluation period for Community Development Loans is January 01, 2013 to December 31, 2016.

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

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: Colorado				Evaluation Period: January 1, 2013 TO December 31,2016					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
Full Review:															
Denver MSA	106	80.92	6.66	5.66	19.71	14.15	35.08	16.98	38.55	63.21	0.04	0.04	0.01	0.03	0.06
Limited Review:															
Colorado Springs MSA	25	19.08	2.51	0.00	21.90	12.00	42.99	32.00	32.59	56.00	0.02	0.00	0.03	0.02	0.02

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT												Geography: Colorado		Evaluation Period: January 1, 2013 TO December 31, 2016				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*							
	#	% of Total*	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp			
Full Review:																		
Denver MSA	11	78.57	6.66	9.09	19.71	27.27	35.08	27.27	38.55	36.36	0.07	0.29	0.00	0.09	0.04			
Limited Review:																		
Colorado Springs MSA	3	21.43	2.51	0.00	21.90	33.33	42.99	33.33	32.59	33.33	0.09	0.00	0.51	0.00	0.00			

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE												Geography: Colorado					Evaluation Period: January 1, 2013 TO December 31, 2016				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp						
Full Review:																					
Denver MSA	156	66.10	6.66	4.49	19.71	9.62	35.08	23.72	38.55	62.18	0.04	0.02	0.03	0.04	0.05						
Limited Review:																					
Colorado Springs MSA	80	33.90	2.51	1.25	21.90	15.00	42.99	53.75	32.59	30.00	0.13	0.00	0.09	0.18	0.08						

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: Colorado					Evaluation Period: January 1, 2013 TO December 31, 2016					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
Denver MSA	6	85.71	21.00	16.67	32.44	0.00	31.88	66.67	14.68	16.67	0.56	0.63	0.00	1.16	0.00	
Limited Review:																
Colorado Springs MSA	1	14.29	11.63	0.00	42.01	0.00	35.38	100.00	10.99	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2015 Peer Mortgage Data: US and PR.

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: Colorado		Evaluation Period: January 1, 2013 TO December 31, 2016			
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*						
	#	% of Total* *	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:																	
Denver MSA	1,747	85.09	8.78	12.82	20.72	37.21	29.52	27.02	40.64	22.95	0.61	0.67	0.63	0.99	0.35		
Limited Review:																	
Colorado Springs MSA	306	14.91	6.91	12.75	23.95	37.58	34.82	29.08	34.23	20.59	0.59	1.16	0.80	0.55			

* Based on 2015 Peer Small Business Data: US and PR.

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

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

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS												Geography: Colorado		E valuation Period: January 1, 2013 TO December 31, 2016		
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Over all	Low	Mod	Mid
Full Review:																
Denver MSA	9	81.82	7.83	11.11	18.68	11.11	32.08	11.11	41.34	66.67	0.39	0.00	0.00	0.00	0.00	0.79
Limited Review:																
Colorado Springs MSA	2	18.18	3.82	0.00	26.16	100.00	40.37	0.00	29.65	0.00	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2015 Peer Small Business Data: US and PR.

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

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

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: Colorado					Evaluation Period: January 1, 2013 TO December 31, 2016					Market Share*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Over all	Low	Mod	Mid	Upp	
Full Review:																
Denver MSA	59	88.06	22.31	7.27	17.15	9.09	20.20	9.09	40.34	74.55	0.04	0.05	0.01	0.02	0.08	
Limited Review:																
Colorado Springs MSA	8	11.94	20.07	0.00	18.25	37.50	21.61	12.50	40.08	50.00	0.03	0.00	0.05	0.00	0.04	

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

**** As a percentage of loans with borrower income information available. No information was available for 6.00% of loans originated and purchased by Bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: Colorado						Evaluation Period: January 1, 2013 TO December 31, 2016							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
Denver MSA	9	75.00	22.31	0.00	17.15	12.50	20.20	25.00	40.34	62.50	0.07	0.00	0.00	0.06	0.12
Limited Review:															
Colorado Springs MSA	3	25.00	20.07	33.33	18.25	0.00	21.61	0.00	40.08	66.67	0.10	0.00	0.00	0.00	0.23

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

**** As a percentage of loans with borrower income information available. No information was available for 8.30% of loans originated and purchased by Bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: Colorado		Evaluation Period: January 1, 2013 TO December 31, 2016													
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*						
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:																	
Denver MSA	98	68.53	22.31	4.65	17.15	10.47	20.20	11.63	40.34	73.26	0.05	0.02	0.03	0.02	0.08		
Limited Review:																	
Colorado Springs MSA	45	31.47	20.07	25.58	18.25	20.93	21.61	23.26	40.08	30.23	0.21	0.80	0.12	0.18	0.14		

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

**** As a percentage of loans with borrower income information available. No information was available for 9.80% of loans originated and purchased by Bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: Colorado		Evaluation Period: January 1, 2013 TO December 31, 2016		
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Denver MSA	1,760	85.19	87.71	16.02	59.03	13.92	27.05	0.61	0.20
Limited Review:									
Colorado Springs MSA	306	14.81	87.86	38.89	57.84	21.59	20.59	0.59	0.39

* Based on 2015 Peer Small Business Data: US and PR.

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

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

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 6.87% of small loans to businesses originated and purchased by the Bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS				Geography: Colorado		Evaluation Period: January 1, 2013 TO December 31, 2016			
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Denver MSA	9	81.82	95.21	11.11	88.89	11.11	0.00	0.39	0.00
Limited Review:									
Colorado Springs MSA	2	18.18	96.26	0.00	0.00	100.00	0.00	0.00	0.00

* Based on 2015 Peer Small Business Data: US and PR.

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

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

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 72.73% of small loans to farms originated and purchased by Bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: Colorado				Evaluation Period: January 1, 2013 TO December 31, 2016			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Denver MSA	0	0	89	10,760	89	10,760	79.95	0	0
Limited Review:									
Colorado Springs MSA	0	0	22	2,578	22	2,578	19.15	0	0
Statewide									
	0	0	2	121	2	121	0.90	0	0e

* '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 institution's financial reporting system.

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: Colorado Evaluation Period: January 1, 2013 TO March 27, 2017																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Denver MSA	77.40	8	66.67	25.00	0.00	50.00	25.00	8	0	+2	0	+4	+2	11.65	23.74	32.40	32.17
Limited Review:																	
Colorado Springs MSA	22.60	4	33.33	25.00	25.00	25.00	25.00	6	2	+1	+1	+1	+1	4.44	26.96	40.33	27.54

Table 1. Lending Volume

LENDING VOLUME		Geography: Kansas				Evaluation Period: January 1, 2012 TO December 31, 2016						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
KS non-MSA	64.65	263	26,518	399	52,602	756	96,231	5	5,225	1,423	180,576	36.99
Topeka MSA	6.50	52	4,986	84	19,756	5	318	2	1,704	143	26,764	33.36
Wichita MSA	18.81	86	16,124	314	87,424	4	115	10	19,246	414	105,589	18.29
Limited Review:												
Lawrence MSA	3.63	15	3,228	64	11,891	0	0	1	4,000	80	19,119	3.52
Manhattan MSA^	6.41	39	10,212	60	10,289	39	4,861	3	5,320	141	30,682	7.84

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

** The evaluation period for Community Development Loans is June 04, 2012 (January 01, 2013 for the Manhattan MSA) to December 31, 2016.

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

^ The evaluation period start date for the Manhattan MSA is January 01, 2013.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: Kansas				Evaluation Period: January 1, 2012 TO December 31, 2016						Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
KS non-MSA	82	48.52	0.00	0.00	7.14	4.88	72.43	80.49	20.43	14.63	1.56	0.00	1.08	2.29	0.00	
Topeka MSA	19	11.24	5.35	5.26	19.69	21.05	38.32	31.58	36.64	42.11	0.11	0.00	0.00	0.09	0.18	
Wichita MSA	45	26.63	3.75	0.00	25.88	11.11	28.86	31.11	41.50	57.78	0.10	0.00	0.05	0.07	0.14	
Limited Review:																
Lawrence MSA	7	4.14	2.25	0.00	16.14	0.00	50.96	57.14	30.65	42.86	0.05	0.00	0.00	0.00	0.19	
Manhattan MSA	16	9.47	0.00	0.00	9.18	0.00	65.14	75.00	25.68	25.00	0.46	0.00	0.00	0.85	0.13	

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

^ The evaluation period start date for the Manhattan MSA is January 01, 2013.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: Kansas				Evaluation Period: January 1, 2012 TO December 31, 2016					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total*	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
KS non-MSA	24	82.76	0.00	0.00	7.14	8.33	72.43	75.00	20.43	16.67	3.16	0.00	0.00	3.74	2.63	
Topeka MSA	1	3.45	5.35	0.00	19.69	100.00	38.32	0.00	36.64	0.00	0.00	0.00	0.00	0.00	0.00	
Wichita MSA	2	6.90	3.75	0.00	25.88	0.00	28.86	0.00	41.50	100.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Lawrence MSA	0	0.00	2.25	0.00	16.14	0.00	50.96	0.00	30.65	0.00	0.00	0.00	0.00	0.00	0.00	
Manhattan MSA^	2	6.90	0.00	0.00	9.18	0.00	65.14	50.00	25.68	50.00	0.70	0.00	0.00	0.00	2.17	

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

^ The evaluation period start date for the Manhattan MSA is January 01, 2013.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE												Geography: Kansas					Evaluation Period: January 1, 2012 TO December 31, 2016				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp						
Full Review:																					
KS non-MSA	154	61.11	0.00	0.00	7.14	5.19	72.43	81.17	20.43	13.64	4.28	0.00	4.00	4.98	2.70						
Topeka MSA	32	12.70	5.35	0.00	19.69	21.88	38.32	40.63	36.64	37.50	0.44	0.00	0.76	0.43	0.36						
Wichita MSA	38	15.08	3.75	2.63	25.88	18.42	28.86	26.32	41.50	52.63	0.17	0.00	0.11	0.13	0.23						
Limited Review:																					
Lawrence MSA	8	3.17	2.25	0.00	16.14	12.50	50.96	37.50	30.65	50.00	0.00	0.00	0.00	0.00	0.00						
Manhattan MSA^	20	7.94	0.00	0.00	9.18	5.00	65.14	70.00	25.68	25.00	0.44	0.00	0.00	0.59	0.31						

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

^ The evaluation period start date for the Manhattan MSA is January 01, 2013.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: Kansas					Evaluation Period: January 1, 2012 TO December 31, 2016					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
KS non-MSA	3	60.00	0.00	0.00	21.16	33.33	54.34	66.67	24.51	0.00	0.00	0.00	0.00	0.00	0.00	
Topeka MSA	0	0.00	20.75	0.00	29.03	0.00	37.52	0.00	12.70	0.00	0.00	0.00	0.00	0.00	0.00	
Wichita MSA	1	20.00	14.03	0.00	36.40	100.00	33.38	0.00	16.18	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Lawrence MSA	0	0.00	19.69	0.00	18.15	0.00	42.99	0.00	19.17	0.00	0.00	0.00	0.00	0.00	0.00	
Manhattan MSA^	1	20.00	0.00	0.00	27.84	100.00	53.83	0.00	18.33	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2015 Peer Mortgage Data: US and PR.

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

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

^ The evaluation period start date for the Manhattan MSA is January 01, 2013.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: Kansas		Evaluation Period: January 1, 2012 TO December 31, 2016				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*							
	#	% of Total*	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																		
KS non-MSA	399	43.32	0.00	0.00	15.26	16.04	67.80	73.18	16.94	10.78	7.06	0.00	8.42	7.64	5.17			
Topeka MSA	84	9.12	20.13	27.38	17.07	52.38	37.14	16.67	25.67	3.57	0.94	1.01	3.31	0.13	0.41			
Wichita MSA	314	34.09	12.59	17.52	23.10	22.93	27.50	17.83	36.81	41.72	0.72	0.98	0.49	0.39	1.03			
Limited Review:																		
Lawrence MSA	64	6.95	7.16	0.00	24.36	23.44	42.33	37.50	26.14	39.06	0.43	0.00	0.27	0.72	0.23			
Manhattan MSA^	60	6.51	0.00	0.00	21.92	41.67	53.73	48.33	24.30	10.00	1.36	0.00	3.14	1.31	0.49			

* Based on 2015 Peer Small Business Data: US and PR.

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

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

^ The evaluation period start date for the Manhattan MSA is January 01, 2013.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															Geography: Kansas		valuation Period: January 1, 2012 TO December 31, 2016	
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*							
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp			
Full Review:																		
KS non-MSA	756	94.03	0.00	0.00	4.08	3.44	77.41	86.51	18.51	10.05	34.74	0.00	100.00	39.13	20.13			
Topeka MSA	5	0.62	2.38	0.00	8.63	0.00	34.52	40.00	54.46	60.00	0.00	0.00	0.00	0.00	0.00			
Wichita MSA	4	0.50	2.98	0.00	13.60	0.00	31.03	0.00	52.39	100.00	0.97	0.00	0.00	0.00	1.79			
Limited Review:																		
Lawrence MSA	0	0.00	2.31	0.00	10.77	0.00	45.38	0.00	41.54	0.00	0.00	0.00	0.00	0.00	0.00			
Manhattan MSA [^]	39	4.85	0.00	0.00	2.47	0.00	77.75	84.62	19.78	15.38	14.00	0.00	0.00	17.07	0.00			

* Based on 2015 Peer Small Business Data: US and PR.

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

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

[^] The evaluation period start date for the Manhattan MSA is January 01, 2013.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: Kansas					Evaluation Period: January 1, 2012 TO December 31, 2016					Market Share*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
KS non-MSA	35	50.72	18.07	5.71	18.48	20.00	21.68	45.71	41.77	28.57	2.03	0.00	2.27	3.05	1.55	
Topeka MSA	3	4.35	21.95	0.00	16.53	0.00	22.24	100.00	39.28	0.00	0.13	0.00	0.00	0.48	0.00	
Wichita MSA	19	27.54	21.25	5.56	18.14	27.78	20.81	27.78	39.80	38.89	0.12	0.12	0.16	0.05	0.15	
Limited Review:																
Lawrence MSA	1	1.45	21.60	0.00	16.23	100.00	21.87	0.00	40.30	0.00	0.06	0.00	0.27	0.00	0.00	
Manhattan MSA^	11	15.94	18.89	10.00	19.25	10.00	22.58	30.00	39.28	50.00	0.49	1.28	0.00	0.71	0.48	

* Based on 2015] Peer Mortgage Data: Us and PR.

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

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

**** As a percentage of loans with borrower income information available. No information was available for 1.70% of loans originated and purchased by Bank.

^ The evaluation period start date for the Manhattan MSA is January 01, 2013.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: Kansas				Evaluation Period: January 1, 2012 TO December 31, 2016					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Over all	Low	Mod	Mid	Upp	
Full Review:																
KS non-MSA	12	75.00	18.07	30.00	18.48	0.00	21.68	30.00	41.77	40.00	2.88	9.09	0.00	9.38	0.00	
Topeka MSA	1	6.25	21.95	0.00	16.53	100.00	22.24	0.00	39.28	0.00	0.00	0.00	0.00	0.00	0.00	
Wichita MSA	1	6.25	21.25	0.00	18.14	0.00	20.81	0.00	39.80	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Lawrence MSA	0	0.00	21.60	0.00	16.23	0.00	21.87	0.00	40.30	0.00	0.00	0.00	0.00	0.00	0.00	
Manhattan MSA^	2	12.50	18.89	0.00	19.25	0.00	22.58	50.00	39.28	50.00	0.79	0.00	0.00	3.85	0.00	

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

**** As a percentage of loans with borrower income information available. No information was available for 21.40% of loans originated and purchased by Bank.

^ The evaluation period start date for the Manhattan MSA is January 01, 2013.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: Kansas		Evaluation Period: January 1, 2012 TO December 31, 2016												
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Over all	Low	Mod	Mid
Full Review:																
KS non-MSA	74	64.35	18.07	17.19	18.48	26.56	21.68	20.31	41.77	35.94	4.70	6.67	8.87	6.15	1.53	
Topeka MSA	17	14.78	21.95	23.53	16.53	17.65	22.24	5.88	39.28	52.94	0.56	2.40	0.33	0.00	0.62	
Wichita MSA	17	14.78	21.25	8.33	18.14	25.00	20.81	25.00	39.80	41.67	0.18	0.31	0.12	0.10	0.24	
Limited Review:																
Lawrence MSA	0	0.00	21.60	0.00	16.23	0.00	21.87	0.00	40.30	0.00	0.00	0.00	0.00	0.00	0.00	
Manhattan MSA^	7	6.09	18.89	0.00	19.25	14.29	22.58	28.57	39.28	57.14	0.60	0.00	0.81	1.25	0.29	

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

**** As a percentage of loans with borrower income information available. No information was available for 13.90% of loans originated and purchased by Bank.

^ The evaluation period start date for the Manhattan MSA is January 01, 2013.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: Kansas		Evaluation Period: January 1, 2012 TO December 31, 2016		
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
KS non-MSA	399	43.32	74.93	56.39	71.93	13.53	14.54	7.06	10.04
Topeka MSA	84	9.12	76.26	30.95	52.38	19.05	28.57	0.94	0.59
Wichita MSA	314	34.09	78.45	20.38	41.08	18.79	40.13	0.72	0.21
Limited Review:									
Lawrence MSA	64	6.95	81.25	39.06	57.81	14.06	28.13	0.43	0.00
Manhattan MSA^	60	6.51	76.68	31.67	63.33	13.33	23.33	1.36	0.33

* Based on 2015 Peer Small Business Data: US and PR.

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

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

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 13.36% of small loans to businesses originated and purchased by the Bank.

^ The evaluation period start date for the Manhattan MSA is January 01, 2013.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS				Geography: Kansas		Evaluation Period: January 1, 2012 TO December 31, 2016			
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
KS non-MSA	756	94.03	97.59	75.26	57.14	28.44	14.42	34.74	42.06
Topeka MSA	5	0.62	97.62	20.00	80.00	20.00	0.00	0.00	0.00
Wichita MSA	4	0.50	96.54	50.00	100.00	0.00	0.00	0.97	0.00
Limited Review:									
Lawrence MSA	0	0.00	96.54	0.00	0.00	0.00	0.00	0.00	0.00
Manhattan MSA^	39	4.85	95.05	66.67	64.10	20.51	15.38	14.00	27.27

* Based on 2015 Peer Small Business Data: US and PR.

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

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

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 14.25% of small loans to farms originated and purchased by Bank.

^ The evaluation period start date for the Manhattan MSA is January 01, 2013.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: Kansas				Evaluation Period: June 4, 2012 TO December 31, 2016			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
KS non-MSA	1	26	34	1,976	35	2,002	11.45	0	0
Topeka MSA	0	0	36	10,046	36	10,046	57.45	0	0
Wichita MSA	0	0	29	2,377	29	2,377	13.59	0	0
Limited Review:									
Lawrence MSA	0	0	4	6	4	6	0.03	0	0
Manhattan MSA^	0	0	18	476	18	476	2.72	0	0
Statewide	0	0	15	2,582	15	2,582	14.76	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 institution's financial reporting system.

^ The evaluation period start date for the Manhattan MSA is January 01, 2013.

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: Kansas Evaluation Period: June 4, 2012 TO March 27, 2017																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
KS non-MSA	36.99	6	46.15	0.00	16.67	66.67	16.68	5	1	0	+1	+2	+1	0.00	10.00	71.19	18.81
Topeka MSA	33.36	2	15.38	0.00	50.00	50.00	0.00	0	1	0	-1	0	0	10.67	22.77	35.97	30.59
Wichita MSA	18.29	2	15.38	50.00	0.00	0.00	50.00	0	1	0	-1	0	0	7.42	30.47	27.40	34.72
Limited Review:																	
Lawrence MSA	3.52	1	7.69	0.00	0.00	0.00	100.00	0	0	0	0	0	0	8.96	20.19	48.38	22.46
Manhattan MSA^	7.84	2	15.38	0.00	50.00	50.00	0.00	2	0	0	+1	+1	0	0.00	23.40	57.05	19.55

^ The evaluation period start date for the Manhattan MSA is January 01, 2013.

Table 1. Lending Volume

LENDING VOLUME		Geography: Missouri						Evaluation Period: January 1, 2012 TO December 31, 2016				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Joplin MSA	9.54	106	12,399	148	25,035	43	4,095	1	7,000	298	48,529	15.98
MO non-MSA	53.86	440	51,362	331	56,790	909	110,218	2	2,953	1,682	221,323	43.05
Springfield MSA	13.77	145	29,723	278	51,445	2	322	5	28,730	430	110,220	17.06
Limited Review:												
Columbia MSA	7.68	80	16,863	146	31,763	14	3,206	0	0	240	51,832	4.53
Jefferson City MSA	5.06	38	6,328	114	33,406	3	429	3	13,000	158	53,163	4.45
St. Joseph MSA	10.09	177	22,667	124	32,019	13	1,934	1	50	315	56,670	14.93

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

** The evaluation period for Community Development Loans is June 04, 2012 to December 31, 2016.

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

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: Missouri				Evaluation Period: January 1, 2012 TO December 31, 2016					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
Full Review:															
Joplin MSA	32	8.82	0.00	0.00	10.37	15.63	82.11	78.13	7.52	6.25	0.13	0.00	0.00	0.12	0.51
MO non-MSA	135	37.19	0.00	0.00	5.23	4.44	72.43	77.78	22.34	17.78	0.74	0.00	0.82	1.02	0.11
Springfield MSA	77	21.21	0.62	0.00	15.28	9.09	55.96	58.44	28.14	32.47	0.17	0.00	0.24	0.18	0.13
Limited Review:															
Columbia MSA	33	9.09	2.00	6.06	14.90	6.06	50.23	54.55	32.87	33.33	0.29	0.00	0.00	0.55	0.09
Jefferson City MSA	10	2.75	0.69	0.00	7.67	0.00	68.74	90.00	22.90	10.00	0.00	0.00	0.00	0.00	0.00
St. Joseph MSA	76	20.94	0.00	0.00	10.66	5.26	65.87	53.95	23.46	40.79	1.04	0.00	2.33	0.76	1.37

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: Missouri				Evaluation Period: January 1, 2012 TO December 31,2016					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total*	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Joplin MSA	10	14.93	0.00	0.00	10.37	10.00	82.11	80.00	7.52	10.00	1.04	0.00	0.00	1.29	0.00	
MO non-MSA	31	46.27	0.00	0.00	5.23	6.45	72.43	87.10	22.34	6.45	2.51	0.00	6.25	2.55	1.47	
Springfield MSA	7	10.45	0.62	0.00	15.28	28.57	55.96	14.29	28.14	57.14	0.37	0.00	1.85	0.32	0.00	
Limited Review:																
Columbia MSA	9	13.43	2.00	22.22	14.90	0.00	50.23	33.33	32.87	44.44	0.88	0.00	0.00	0.88	1.14	
Jefferson City MSA	2	2.99	0.69	0.00	7.67	0.00	68.74	50.00	22.90	50.00	0.00	0.00	0.00	0.00	0.00	
St. Joseph MSA	8	11.94	0.00	0.00	10.66	0.00	65.87	87.50	23.46	12.50	1.72	0.00	0.00	1.68	2.63	

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE												Geography: Missouri					Evaluation Period: January 1, 2012 TO December 31, 2016				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp						
Full Review:																					
Joplin MSA	63	11.62	0.00	0.00	10.37	11.11	82.11	88.89	7.52	0.00	1.03	0.00	1.36	1.09	0.00						
MO non-MSA	271	50.00	0.00	0.00	5.23	3.69	72.43	72.69	22.34	23.62	2.54	0.00	1.23	2.71	2.30						
Springfield MSA	59	10.89	0.62	0.00	15.28	3.39	55.96	44.07	28.14	52.54	0.23	0.00	0.00	0.17	0.40						
Limited Review:																					
Columbia MSA	35	6.46	2.00	14.29	14.90	20.00	50.23	25.71	32.87	40.00	0.53	2.94	0.93	0.23	0.66						
Jefferson city MSA	25	4.61	0.69	0.00	7.67	4.00	68.74	56.00	22.90	40.00	0.09	0.00	0.00	0.00	0.39						
St. Joseph MSA	89	16.42	0.00	0.00	10.66	8.99	65.87	71.91	23.46	19.10	0.77	0.00	2.63	0.74	0.35						

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY			Geography: Missouri				Evaluation Period: January 1, 2012 TO December 31, 2016					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
Joplin MSA	1	7.14	0.00	0.00	24.74	0.00	71.98	100.00	3.25	0.00	4.35	0.00	0.00	6.25	0.00	
MO non-MSA	3	21.43	0.00	0.00	5.79	0.00	53.32	0.00	40.89	100.00	0.00	0.00	0.00	0.00	0.00	
Springfield MSA	2	14.29	8.27	0.00	28.99	50.00	45.27	50.00	17.47	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Columbia MSA	3	21.43	22.02	0.00	29.36	0.00	18.36	100.00	30.27	0.00	0.00	0.00	0.00	0.00	0.00	
Jefferson City MSA	1	7.14	10.64	0.00	34.57	0.00	40.15	100.00	14.64	0.00	0.00	0.00	0.00	0.00	0.00	
St. Joseph MSA	4	28.57	0.00	0.00	19.61	0.00	67.55	100.00	12.84	0.00	12.50	0.00	0.00	20.00	0.00	

* Based on 2015 Peer Mortgage Data: US and PR.

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: Missouri		Evaluation Period: January 1, 2012 TO December 31, 2016			
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*						
	#	% of Total*	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:																	
Joplin MSA	148	12.97	0.00	0.00	15.09	41.22	77.86	53.38	7.06	5.41	1.62	0.00	3.53	1.26	1.70		
MO non-MSA	331	29.01	0.00	0.00	6.18	4.83	70.64	69.79	23.19	25.38	1.72	0.00	1.54	1.47	2.58		
Springfield MSA	278	24.36	0.96	0.72	26.48	39.21	49.67	34.17	22.88	25.90	0.96	0.00	1.27	0.76	1.11		
Limited Review:																	
Columbia MSA	146	12.80	17.98	9.59	18.57	19.18	35.73	32.19	27.72	39.04	1.03	0.47	1.21	0.97	1.34		
Jefferson City MSA	114	9.99	10.90	28.07	13.31	7.02	54.98	50.88	20.81	14.04	0.82	2.80	0.68	0.87	0.21		
St. Joseph MSA	124	10.87	0.00	0.00	16.46	19.35	62.84	56.45	20.71	24.19	1.57	0.00	3.11	1.39	1.06		

* Based on 2015 Peer Small Business Data: US and PR.

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

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

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS												Geography: Missouri		Evaluation Period: January 1, 2012 TO December 31, 2016				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*							
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp			
Full Review:																		
Joplin MSA	43	4.37	0.00	0.00	4.48	11.63	91.51	88.37	4.01	0.00	4.05	0.00	0.00	4.21	0.00			
MO non-MSA	909	92.38	0.00	0.00	5.76	1.32	72.12	71.29	22.12	27.39	9.77	0.00	2.53	10.25	10.03			
Springfield MSA	2	0.20	0.41	0.00	8.81	0.00	67.62	50.00	23.17	50.00	0.00	0.00	0.00	0.00	0.00			
Limited Review:																		
Columbia MSA	14	1.42	3.10	0.00	14.60	14.29	63.72	57.14	18.58	28.57	1.79	0.00	4.17	1.41	0.00			
Jefferson City MSA	3	0.30	2.01	0.00	5.51	0.00	75.69	66.67	16.79	33.33	0.47	0.00	0.00	0.56	0.00			
St. Joseph MSA	13	1.32	0.00	0.00	2.56	0.00	78.63	84.62	18.80	15.38	0.74	0.00	0.00	0.88	0.00			

* Based on 2015 Peer Small Business Data: US.

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

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

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: Missouri				Evaluation Period: January 1, 2012 TO December 31, 2016					Market Share*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
Joplin MSA	10	7.94	20.33	0.00	18.97	20.00	19.91	40.00	40.79	40.00	0.17	0.00	0.00	0.20	0.30	
MO non-MSA	39	30.95	18.22	3.03	17.51	30.30	22.03	27.27	42.24	39.39	0.76	0.00	1.23	0.75	0.67	
Springfield MSA	35	27.78	18.37	6.67	17.65	23.33	22.16	20.00	41.82	50.00	0.20	0.20	0.06	0.20	0.29	
Limited Review:																
Columbia MSA	16	12.70	20.99	8.33	17.14	33.33	22.34	16.67	39.53	41.67	0.21	0.24	0.00	0.13	0.38	
Jefferson City MSA	1	0.79	17.39	100.00	18.45	0.00	24.11	0.00	40.06	0.00	0.00	0.00	0.00	0.00	0.00	
St. Joseph MSA	25	19.84	18.90	8.70	18.32	30.43	22.83	21.74	39.95	39.13	1.18	0.00	1.09	1.63	1.32	

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

**** As a percentage of loans with borrower income information available. No information was available for 13.50% of loans originated and purchased by Bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: Missouri				Evaluation Period: January 1, 2012 TO December 31, 2016					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Over all	Low	Mod	Mid	Upp	
Full Review:																
Joplin MSA	7	20.59	20.33	14.29	18.97	28.57	19.91	14.29	40.79	42.86	1.12	4.00	2.08	0.00	0.72	
MO non-MSA	13	38.24	18.22	0.00	17.51	46.15	22.03	15.38	42.24	38.46	2.76	0.00	9.43	1.18	1.83	
Springfield MSA	4	11.76	18.37	66.67	17.65	33.33	22.16	0.00	41.82	0.00	0.40	2.33	1.18	0.00	0.00	
Limited Review:																
Columbia MSA	5	14.71	20.99	0.00	17.14	0.00	22.34	0.00	39.53	0.00	0.00	0.00	0.00	0.00	0.00	
Jefferson City MSA	0	0.00	17.39	0.00	18.45	0.00	24.11	0.00	40.06	0.00	0.00	0.00	0.00	0.00	0.00	
St. Joseph MSA	5	14.71	18.90	0.00	18.32	0.00	22.83	50.00	39.95	50.00	1.25	0.00	0.00	2.94	1.32	

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

**** As a percentage of loans with borrower income information available. No information was available for 20.60% of loans originated and purchased by Bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: Missouri		Evaluation Period: January 1, 2012 TO December 31, 2016											
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [†]				
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	Over all	Low	Mod	Mid	Upp
Full Review:															
Joplin MSA	28	14.51	20.33	3.85	18.97	19.23	19.91	23.08	40.79	53.85	1.23	1.04	0.85	0.95	1.56
MO non-MSA	102	52.85	18.22	6.32	17.51	11.58	22.06	16.84	42.24	65.26	3.48	2.97	2.33	2.27	4.42
Springfield MSA	21	10.88	18.37	11.76	17.65	29.41	22.16	5.88	41.82	52.94	0.26	0.35	0.30	0.00	0.36
Limited Review:															
Columbia MSA	16	8.29	20.99	15.38	17.14	23.08	22.34	15.38	39.53	46.15	0.65	1.50	0.72	0.29	0.36
Jefferson City MSA	6	3.11	17.39	0.00	18.45	50.00	24.11	33.33	40.06	16.67	0.11	0.00	0.00	0.41	0.00
St. Joseph MSA	20	10.36	18.90	25.00	18.32	20.00	22.83	15.00	39.95	40.00	0.99	0.00	0.57	0.53	1.66

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

**** As a percentage of loans with borrower income information available. No information was available for 8.30% of loans originated and purchased by Bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: Missouri		Evaluation Period: January 1, 2012 TO December 31, 2016		
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Joplin MSA	148	12.97	79.64	39.19	58.11	25.00	16.89	1.62	0.99
MO non-MSA	331	29.01	81.09	51.06	60.42	18.73	20.85	1.72	1.73
Springfield MSA	278	24.36	81.16	30.58	55.76	19.78	24.46	0.96	0.57
Limited Review:									
Columbia MSA	146	12.80	80.80	43.15	45.89	23.29	30.82	1.03	1.35
Jefferson City MSA	114	9.99	77.36	34.21	36.84	21.93	41.23	0.82	0.63
St. Joseph MSA	124	10.87	76.93	34.68	44.35	22.58	33.06	1.57	1.75

* Based on 2015 Peer Small Business Data: US and PR.

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

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

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 10.60% of small loans to businesses originated and purchased by the Bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS				Geography: Missouri		Evaluation Period: January 1, 2012 TO December 31, 2016			
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Joplin MSA	43	4.37	99.06	74.42	67.44	27.91	4.65	4.05	3.30
MO non-MSA	909	92.38	98.89	66.67	61.50	25.74	12.76	9.77	9.54
Springfield MSA	2	0.20	97.70	100.00	50.00	0.00	50.00	0.00	0.00
Limited Review:									
Columbia MSA	14	1.42	96.24	50.00	14.29	50.00	35.71	1.79	1.19
Jefferson City MSA	3	0.30	97.49	66.67	66.67	0.00	33.33	0.47	0.00
St. Joseph MSA	13	1.32	98.01	61.54	53.85	15.38	30.77	0.74	2.08

* Based on 2015 Peer Small Business Data: US and PR.

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

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

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 21.54% of small loans to farms originated and purchased by Bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: Missouri				Evaluation Period: June 4, 2012 TO December 31, 2016			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Joplin MSA	2	1,081	28	1,886	30	2,937	12.18	0	0
MO non-MSA	0	0	39	2,444	39	2,444	10.14	0	0
Springfield MSA	0	0	19	907	19	907	3.76	0	0
Limited Review:									
Columbia MSA	0	0	14	369	14	369	1.53	0	0
Jefferson City MSA	0	0	9	220	9	220	0.91	0	0
St. Joseph MSA	0	0	13	1,495	13	1,495	6.20	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 institution's financial reporting system.

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: Missouri Evaluation Period: June 4, 2012 TO March 27, 2017																	
MA/Assessment Area:	Deposit s	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposit s in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Joplin MSA	15.98	2	10.53	0.00	50.00	50.00	0.00	0	2	0	0	-2	0	0.00	12.99	80.87	6.14
MO non-MSA	43.05	10	52.63	0.00	0.00	100.00	0.00	0	2	0	0	-2	0	0.00	5.65	70.62	23.74
Springfield MSA	17.06	3	15.79	0.00	100.00	0.00	0.00	0	0	0	0	0	0	2.86	18.27	54.33	24.54
Limited Review:																	
Columbia MSA	4.53	1	5.26	0.00	0.00	0.00	100.00	0	0	0	0	0	0	9.78	19.24	42.29	28.69
Jefferson City MSA	4.45	1	5.26	0.00	0.00	100.00	0.00	0	0	0	0	0	0	1.86	10.13	67.49	20.52
St. Joseph MSA	14.93	2	10.23	0.00	0.00	100.00	0.00	0	1	0	0	-1	0	0.00	14.46	64.32	21.22

Table 1. Lending Volume

LENDING VOLUME		Geography: Nebraska						Evaluation Period: January 1, 2012 TO December 31, 2016				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Omaha MSA	100.00	39	15,570	184	37,014	1	150	7	47,449	231	100,183	100.00

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

** The evaluation period for Community Development Loans is June 04, 2012 to December 31, 2016.

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

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: Nebraska				Evaluation Period: January 1, 2012 TO December 31, 2016					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
Full Review:															
Omaha MSA	11	100.00	8.95	9.09	18.49	18.18	37.97	45.45	34.58	27.27	0.01	0.00	0.00	0.00	0.02

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT												Geography: Nebraska		Evaluation Period: January 1, 2012 TO December 31, 2016				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*							
	#	% of Total*	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp			
Full Review:																		
Omaha MSA	0	0.00	8.95	0.00	18.49	0.00	37.97	0.00	34.58	0.00	0.00	0.00	0.00	0.00	0.00			

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: Nebraska Evaluation Period: January 1, 2012 TO December 31, 2016												
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Omaha MSA	26	100.00	8.95	0.00	18.49	7.69	37.97	42.31	34.58	50.00	0.01	0.00	0.00	0.04	0.00

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: Nebraska					Evaluation Period: January 1, 2012 TO December 31, 2016					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
Omaha MSA	2	100.00	15.83	0.00	33.32	50.00	36.43	50.00	14.43	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2015 Peer Mortgage Data: US and PR.

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: Nebraska		Evaluation Period: January 1, 2012 TO December 31, 2016			
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*						
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:																	
Omaha MSA	183	100.00	8.83	2.73	19.34	14.21	37.93	56.83	33.25	26.23	0.41	0.27	0.58	0.53	0.24		

* Based on 2015 Peer Small Business Data: US.

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

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

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS												Geography: Nebraska					E valuation Period: January 1, 2012 TO December 31, 2016				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp				
Full Review:																					
Omaha MSA	1	100.00	4.16	0.00	13.32	0.00	45.79	0.00	36.63	100.00	0.00	0.00	0.00	0.00	0.00	0.00					

* Based on 2015 Peer Small Business Data: US.

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

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

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: Nebraska					Evaluation Period: January 1, 2012 TO December 31, 2016					Market Share*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Over all	Low	Mod	Mid	Upp	
Full Review:																
Omaha MSA	1	100.00	22.77	0.00	17.24	0.00	21.35	0.00	38.64	100.00	0.01	0.00	0.00	0.00	0.03	

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

**** As a percentage of loans with borrower income information available. No information was available for 0.00% of loans originated and purchased by Bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: Nebraska				Evaluation Period: January 1, 2012 TO December 31, 2016					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Over all	Low	Mod	Mid	Upp	
Full Review:																
Omaha MSA	0	0.00	22.77	0.00	17.24	0.00	21.35	0.00	38.64	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

**** As a percentage of loans with borrower income information available. No information was available for 0.00% of loans originated and purchased by Bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: Nebraska		Evaluation Period: January 1, 2012 TO December 31, 2016											
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
Omaha MSA	6	100.00	22.77	25.00	17.24	25.00	21.35	0.00	38.64	50.00	0.02	0.22	0.00	0.00	0.00

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

**** As a percentage of loans with borrower income information available. No information was available for 33.30% of loans originated and purchased by Bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES				Geography: Nebraska		Evaluation Period: January 1, 2012 TO December 31, 2016			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Omaha MSA	184	100.00	79.31	35.33	55.98	21.20	22.83	0.41	0.29

* Based on 2015 Peer Small Business Data: US and PR.

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

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

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 11.41% of small loans to businesses originated and purchased by the Bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS				Geography: Nebraska		Evaluation Period: January 1, 2012 TO December 31, 2016			
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Omaha MSA	1	100.00	95.73	0.00	0.00	100.00	0.00	0.00	0.00

* Based on 2015 Peer Small Business Data: US and PR.

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

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

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 100.00% of small loans to farms originated and purchased by Bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: Nebraska				Evaluation Period: June 4, 2012 TO December 31, 2016			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Omaha MSA	0	0	23	1,373	23	1,373	99.99	0	0
Statewide	0	0	2	164	2	164	0.01	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 institution's financial reporting system.

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: Nebraska Evaluation Period: June 4, 2012 TO March 27, 2017																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Omaha MSA	100.00	1	100.00	0.00	0.00	0.00	100.00	0	2	0	-1	-1	0	13.75	22.56	33.67	29.52

Table 1. Lending Volume

LENDING VOLUME		Geography: Oklahoma						Evaluation Period: January 1, 2012 TO December 31, 2016				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Oklahoma City MSA	73.90	73	23,284	464	111,672	1	125	14	27,000	552	162,081	83.23
Limited Review:												
Tulsa MSA	26.10	19	8,081	170	44,933	0	0	6	14,500	195	67,514	16.77

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

** The evaluation period for Community Development Loans is June 04, 2012 to December 31, 2016.

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

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: Oklahoma				Evaluation Period: January 1, 2012 TO December 31, 2016					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Oklahoma City MSA	26	78.79	5.61	19.23	25.15	19.23	34.33	3.85	34.91	57.69	0.03	0.00	0.07	0.00	0.04	
Limited Review:																
Tulsa MSA	7	21.21	5.35	0.00	20.55	0.00	31.63	14.29	42.47	85.71	0.01	0.00	0.00	0.00	0.02	

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: Oklahoma				Evaluation Period: January 1, 2012 TO December 31, 2016					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total*	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Oklahoma City MSA	5	83.33	5.61	0.00	25.15	40.00	34.33	0.00	34.91	60.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Tulsa MSA	1	16.67	5.35	0.00	20.55	0.00	31.63	0.00	42.47	100.00	0.08	0.00	0.00	0.00	0.16	

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE												Geography: Oklahoma					Evaluation Period: January 1, 2012 TO December 31, 2016				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp						
Full Review:																					
Oklahoma City MSA	41	78.85	5.61	4.88	25.15	9.76	34.33	24.39	34.91	60.98	0.06	0.00	0.09	0.14	0.00						
Limited Review:																					
Tulsa MSA	11	21.15	5.35	0.00	20.55	18.18	31.63	27.27	42.47	54.55	0.02	0.00	0.00	0.06	0.00						

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY			Geography: Oklahoma				Evaluation Period: January 1, 2012 TO December 31, 2016					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
Oklahoma City MSA	1	100.00	6.65	0.00	47.73	100.00	27.12	0.00	18.51	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Tulsa MSA	0	0.00	10.99	0.00	34.29	0.00	28.55	0.00	26.17	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2015 Peer Mortgage Data: US and PR.

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: Oklahoma		Evaluation Period: January 1, 2012 TO December 31, 2016				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*							
	#	% of Total*	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																		
Oklahoma City MSA	452	72.67	8.17	25.00	24.01	20.80	31.27	24.56	34.64	29.65	0.69	1.73	0.56	0.49	0.70			
Limited Review:																		
Tulsa MSA	170	27.33	6.78	14.71	23.62	23.53	28.20	30.59	41.39	31.18	0.28	1.13	0.31	0.28	0.14			

* Based on 2015 Peer Small Business Data: US and PR.

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

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

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS												Geography: Oklahoma					valuation Period: January 1, 2012 TO December 31, 2016				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Over all	Low	Mod	Mid	Upp						
Full Review:																					
Oklahoma City MSA	1	100.00	4.79	0.00	20.85	0.00	31.28	100.00	42.65	0.00	0.00	0.00	0.00	0.00	0.00						
Limited Review:																					
Tulsa MSA	0	0.00	4.60	0.00	16.65	0.00	36.53	0.00	42.21	0.00	0.00	0.00	0.00	0.00	0.00						

* Based on 2015 Peer Small Business Data: US and PR.

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

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

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: Oklahoma					Evaluation Period: January 1, 2012 TO December 31, 2016					Market Share*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Over all	Low	Mod	Mid	Upp	
Full Review:																
Oklahoma City MSA	11	84.62	24.44	0.00	18.46	37.50	19.47	12.50	37.64	50.00	0.04	0.00	0.00	0.04	0.06	
Limited Review:																
Tulsa MSA	2	15.38	20.96	0.00	17.56	0.00	19.63	0.00	41.85	100.00	0.01	0.00	0.00	0.00	0.02	

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

**** As a percentage of loans with borrower income information available. No information was available for 23.10% of loans originated and purchased by Bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: Oklahoma				Evaluation Period: January 1, 2012 TO December 31, 2016					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Over all	Low	Mod	Mid	Upp	
Full Review:																
Oklahoma City MSA	3	75.00	24.44	50.00	18.46	0.00	19.47	0.00	37.64	50.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Tulsa MSA	1	25.00	20.96	100.00	17.56	0.00	19.63	0.00	41.85	0.00	0.09	1.03	0.00	0.00	0.00	

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

**** As a percentage of loans with borrower income information available. No information was available for 25.00% of loans originated and purchased by Bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: Oklahoma		Evaluation Period: January 1, 2012 TO December 31, 2016													
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*						
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:																	
Oklahoma City MSA	10	62.50	24.44	37.50	18.46	12.50	19.47	12.50	37.64	37.50	0.08	0.54	0.00	0.09	0.04		
Limited Review:																	
Tulsa MSA	6	37.50	20.96	0.00	17.56	40.00	19.63	20.00	41.85	40.00	0.02	0.00	0.14	0.00	0.00		

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

**** As a percentage of loans with borrower income information available. No information was available for 18.80% of loans originated and purchased by Bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: Oklahoma		Evaluation Period: January 1, 2012 TO December 31, 2016		
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Oklahoma City MSA	464	73.19	82.88	33.84	48.06	17.03	34.91	0.69	0.66
Limited Review:									
Tulsa MSA	170	26.81	84.55	18.24	48.82	11.76	39.41	0.28	0.06

* Based on 2015 Peer Small Business Data: US.

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

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

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 16.09% of small loans to businesses originated and purchased by the Bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS				Geography: Oklahoma		Evaluation Period: January 1, 2012 TO December 31, 2016			
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Oklahoma City MSA	1	100.00	94.70	0.00	0.00	100.00	0.00	0.00	0.00
Limited Review:									
Tulsa MSA	0	0.00	94.52	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2015 Peer Small Business Data: US and PR.

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

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

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 100.00% of small loans to farms originated and purchased by Bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: Oklahoma				Evaluation Period: June 4, 2012 TO December 31, 2016			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Oklahoma City MSA	0	0	18	2,127	18	2,127	6.75	0	0
Limited Review:									
Tulsa MSA	0	0	10	2,829	10	2,829	8.98	0	0
Statewide									
	0	0	59	26,556	59	26,556	84.27	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 institution's financial reporting system.

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: Oklahoma Evaluation Period: June 4, 2012 TO March 27, 2017																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Oklahoma City MSA	83.23	4	80.00	50.00	0.00	25.00	25.00	0	1	-1	0	0	0	9.20	32.08	30.42	28.17
Limited Review:																	
Tulsa MSA	16.77	1	20.00	0.00	0.00	100.00	0.00	0	0	0	0	0	0	9.13	25.63	30.04	35.21

Table 1. Lending Volume

LENDING VOLUME		Geography: Texas				Evaluation Period: October 18, 2013 TO December 31, 2016						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Dallas MD	67.98	62	23,958	76	33,048	0	0	2	14,500	140	71,506	72.38
Limited Review:												
Ft. Worth MD^	32.02	28	32,880	35	11,366	2	350	1	2,662	66	47,258	27.62

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

** The evaluation period for Community Development Loans is October 18, 2013 (July 1, 2014 for the Ft. Worth MD) to December 31, 2016.

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

^ The evaluation period start date of the Ft. Worth MS is July 1, 2014.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: Texas				Evaluation Period: October 18, 2013 TO December 31, 2016					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Dallas MD	34	72.34	5.45	26.47	19.40	23.53	27.57	23.53	47.58	26.47	0.03	0.40	0.08	0.03	0.01	
Limited Review:																
Ft. Worth MD^	13	27.66	4.10	0.00	20.39	38.46	37.59	38.46	37.91	23.08	0.02	0.00	0.09	0.02	0.01	

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

^ The evaluation period start date of the Ft. Worth MS is July 1, 2014.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT															Geography: Texas		Evaluation Period: October 18, 2013 TO December 31, 2016				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total*	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp						
Full Review:																					
Dallas MD	1	25.00	5.45	100.00	19.40	0.00	27.57	0.00	47.58	0.00	0.00	0.00	0.00	0.00	0.00						
Limited Review:																					
Ft. Worth MD^	3	75.00	4.10	0.00	20.39	33.33	37.59	66.67	37.91	0.00	0.05	0.00	0.35	0.00	0.00						

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

^ The evaluation period start date of the Ft. Worth MS is July 1, 2014.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE												Geography: Texas					Evaluation Period: October 18, 2013 TO December 31, 2016				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp						
Full Review:																					
Dallas MD	23	82.14	5.45	4.35	19.40	39.13	27.57	26.09	47.58	30.43	0.01	0.00	0.00	0.01	0.01						
Limited Review:																					
Ft. Worth MD^	5	17.86	4.10	0.00	20.39	20.00	37.59	80.00	37.91	0.00	0.01	0.00	0.05	0.01	0.00						

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

^ The evaluation period start date of the Ft. Worth MS is July 1, 2014.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: Texas					Evaluation Period: October 18, 2013 TO December 31, 2016					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp	
Full Review:																
Dallas MD	4	36.36	24.19	50.00	27.76	25.00	25.43	25.00	22.62	0.00	1.18	1.90	1.02	1.35	0.00	
Limited Review:																
Ft. Worth MD^	7	63.64	8.52	14.29	36.65	57.14	43.52	14.29	11.31	14.29	3.57	5.00	6.00	1.43	3.57	

* Based on 2015 Peer Mortgage Data: US and PR.

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

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

^ The evaluation period start date or the Ft. Worth MS is July 1, 2014.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: Texas		Evaluation Period: October 18, 2013 TO December 31, 2016			
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*						
	#	% of Total*	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:																	
Dallas MD	76	68.47	8.20	6.58	17.57	23.68	24.39	39.47	49.61	30.26	0.03	0.00	0.02	0.10	0.01		
Limited Review:																	
Ft. Worth MD^	35	31.53	4.95	2.86	21.84	14.29	33.52	37.14	39.51	45.71	0.01	0.06	0.00	0.01	0.02		

* Based on 2015 Peer Small Business Data: US and PR.

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

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

^ The evaluation period start date of the Ft. Worth MS is July 1, 2014.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS												Geography: Texas		E valuation Period: October 18, 2013 TO December 31, 2016				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*							
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp			
Full Review:																		
Dallas MD	0	0.00	5.98	0.00	16.66	0.00	29.82	0.00	47.46	0.00	0.00	0.00	0.00	0.00	0.00			
Limited Review:																		
Ft. Worth MD^	2	100.00	3.71	0.00	18.94	0.00	36.97	50.00	40.39	50.00	1.08	0.00	0.00	3.03	0.00			

* Based on 2015 Peer Small Business Data: US and PR.

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

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

^ The evaluation period start date or the Ft. Worth MS is July 1, 2014.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: Texas					Evaluation Period: October 18, 2013 TO December 31, 2016					Market Share*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Over all	Low	Mod	Mid	Upp	
Full Review:																
Dallas MD	34	73.91	23.34	0.00	16.53	0.00	17.86	0.00	42.27	100.00	0.00	0.00	0.00	0.00	0.01	
Limited Review:																
Ft. Worth MD^	12	26.09	21.85	0.00	17.21	0.00	19.30	0.00	41.65	100.00	0.00	0.00	0.00	0.00	0.01	

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

**** As a percentage of loans with borrower income information available. No information was available for 69.60% of loans originated and purchased by Bank.

^ The evaluation period start date of the Ft. Worth MS is July 1, 2014.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: Texas				Evaluation Period: October 18, 2013 TO December 31, 2016					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Over all	Low	Mod	Mid	Upp	
Full Review:																
Dallas MD	1	25.00	23.34	0.00	16.53	0.00	17.86	0.00	42.27	100.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Ft. Worth MD^	3	75.00	21.85	0.00	17.21	0.00	19.30	0.00	41.65	100.00	0.05	0.00	0.00	0.00	0.08	

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

**** As a percentage of loans with borrower income information available. No information was available for 25.00% of loans originated and purchased by Bank.

^ The evaluation period start date of the Ft. Worth MS is July 1, 2014.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															Geography: Texas		Evaluation Period: October 18, 2013 TO December 31, 2016				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [*]										
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	Over all	Low	Mod	Mid	Upp						
Full Review:																					
Dallas MD	22	81.48	23.34	0.00	16.53	0.00	17.86	14.29	42.27	85.71	0.00	0.00	0.00	0.01	0.00						
Limited Review:																					
Ft. Worth MD [^]	5	18.52	21.85	0.00	17.21	0.00	19.30	0.00	41.65	100.00	0.00	0.00	0.00	0.00	0.00						

* Based on 2015 Peer Mortgage Data: US and PR.

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

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

**** As a percentage of loans with borrower income information available. No information was available for 63.00% of loans originated and purchased by Bank.

[^] The evaluation period start date of the Ft. Worth MS is July 1, 2014.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: Texas		Evaluation Period: October 18, 2013 TO December 31, 2016		
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Dallas MD	76	68.47	85.34	13.16	27.63	9.21	63.16	0.03	0.00
Limited Review:									
Ft. Worth MD^	35	31.53	84.92	28.57	34.29	20.00	45.71	0.01	0.01

* Based on 2015 Peer Small Business Data: US and PR.

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

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

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 25.23 of small loans to businesses originated and purchased by the Bank.

^ The evaluation period start date or the Ft. Worth MS is July 1, 2014.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS				Geography: Texas		Evaluation Period: October 18, 2013 TO December 31, 2016			
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Dallas MD	0	0.00	94.48	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:									
Ft. Worth MD^	2	100.00	95.02	0.00	50.00	50.00	0.00	1.08	0.00

* Based on 2015 Peer Small Business Data: US and PR.

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

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

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 50.00% of small loans to farms originated and purchased by Bank.

^ The evaluation period start date of the Ft. Worth MS is July 1, 2014.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: Texas				Evaluation Period: October 18, 2013 TO December 31, 2016			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Dallas MD	0	0	18	2,740	18	2,740	61.63	0	0
Limited Review:									
Ft. Worth MD^	0	0	8	25	8	25	0.56	0	0
Statewide									
	0	0	5	1,681	5	1,681	37.81	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 institution's financial reporting system.

^ The evaluation period start date of the Ft. Worth MS is July 1, 2014.

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: Texas Evaluation Period: June 4, 2012 TO March 27, 2017																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Dallas MD	72.38	4	80.00	25.00	0.00	50.00	25.00	5	1	+1	0	+2	+1	11.85	25.21	26.19	36.75
Limited Review:																	
Ft. Worth MD [^]	27.62	1	20.00	0.00	0.00	0.00	100.00	2	1	0	0	0	+1	7.23	26.22	35.81	30.74

[^] The evaluation period start date or the Ft. Worth MS is July 1, 2014.