



PUBLIC DISCLOSURE

May 25, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

UMB Bank, National Association
Charter Number: 23920

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Kansas City, MO 64106

Office of the Comptroller of the Currency
Midsize 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.

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Overall CRA Rating

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

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

Performance Levels	UMB Bank, National Association Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	
High Satisfactory	X		X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based primarily on the High Satisfactory Lending Test ratings in the Kansas City MMSA and St. Louis MMSA, which were weighted most heavily when arriving at the Lending Test rating. UMB is a leader in making CD loans in the Kansas City MMSA and the St. Louis MMSA. CD lending had a significantly positive impact on the Lending Test ratings in the Kansas City MMSA and the St. Louis MMSA.
- The Investment Test rating is based primarily on the Outstanding Investment Test ratings in the Kansas City MMSA and St. Louis MMSA, which were weighted most heavily when arriving at the Investment Test rating. In the Kansas City MMSA and St. Louis MMSA, UMB had an excellent level of qualified CD investments and grants often in a leadership position. The bank’s CD investments exhibited excellent responsiveness and demonstrated innovation and complexity.
- The Service Test rating is based primarily on the Outstanding Service Test rating in the Kansas City MMSA, along with the High Satisfactory Service Test ratings in the St. Louis MMSA, which were weighted most heavily when arriving at the Service Test rating. Branches are readily accessible in the Kansas City MMSA. In the Kansas City MMSA and St. Louis MMSA, UMB is a leader in providing CD services. CD services were responsive to identified community needs and demonstrated innovation and complexity.

Lending in Assessment Area

A high percentage of the bank’s loans are in UMB AAs.

The bank originated and purchased 79.1 percent of its total loans inside the bank's AA's during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. We consider loans inside the AA as part of the geographical distribution part of the Lending Test.

Table D - Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2017	788	85.4	135	14.6	923	197,068	73.1	72,607	26.9	269,675
2018	2,044	87.4	296	12.6	2,340	394,008	76.2	123,238	23.8	517,246
2019	2,543	84.8	455	15.2	2,998	631,638	74.6	215,265	25.4	846,903
Subtotal	5,375	85.8	886	14.2	6,261	1,222,714	74.8	411,109	25.2	1,633,823
Small Business										
2017	1,774	77.7	508	22.3	2,282	481,155	82.7	100,853	17.3	582,008
2018	1,715	78.9	460	21.1	2,175	485,820	82.0	106,969	18.0	592,789
2019	1,648	76.1	518	23.9	2,166	465,703	79.8	117,712	20.2	583,415
Subtotal	5,137	77.6	1,486	22.4	6,623	1,432,678	81.5	325,534	18.5	1,758,212
Small Farm										
2017	212	51.7	198	48.3	410	38,175	50.3	37,740	49.7	75,915
2018	161	46.1	188	53.9	349	29,649	46.9	33,636	53.2	63,285
2019	108	41.1	155	58.9	263	21,508	40.5	31,653	59.5	53,161
Subtotal	481	47.1	541	52.9	1,022	89,332	46.4	103,029	53.6	192,361
Total	10,993	79.1	2,913	20.9	13,906	2,744,724	76.6	839,672	23.4	3,584,396
<i>Source: Evaluation Period: 1/1/2017 - 12/31/2019 Bank Data Due to rounding, totals may not equal 100.0</i>										

Description of Institution

UMB is a multistate financial institution headquartered in Kansas City, Missouri. UMB is a wholly-owned subsidiary of UMB Financial Corporation, a \$26.4 billion financial services company founded in 1913 and also headquartered in Kansas City, Missouri. UMB Bank has approximately 2,961 employees.

UMB is a full-service institution with 94 branches and 96 deposit-taking automated teller machines (ATMs). For this performance evaluation UMB has nine rating areas: Kansas City Multi-State MSA (Kansas City MMSA or K.C. MMSA), St. Louis Multi-State MSA (St. Louis MMSA), and the states of Arizona, Colorado, Kansas, Missouri, Nebraska, Oklahoma, and Texas. Refer to the Multi-State MSA (MMSA) or State rating sections of this evaluation for details on the bank's performance by area.

UMB's business strategy is to provide banking products and financing to individuals, families, and businesses within the institution's footprint and in the national arena. UMB's lending focuses on home mortgage loans and small loans to businesses. UMB Financial Corporation and UMB are aligned into four business segments consisting of commercial banking; institutional investment banking (asset management); personal banking; and healthcare services.

According to the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report dated June 30, 2019, UMB Bank had total deposits of \$13.6 billion. UMB is the tenth largest commercial bank operating in the Kansas City MMSA, while ranking first for deposit market share. As of December 31, 2019, UMB had total assets of \$26.4 billion and tier 1 capital of \$2.1 billion. The loan portfolio accounts for approximately 51.0 percent of total assets. Real estate loans comprise approximately 49.0 percent of the total loan portfolio, 44.0 percent commercial and industrial, and two percent consumer credit cards. The remaining portfolio is comprised of asset-based loans, commercial credit cards, factoring loans and consumer loans.

The bank did not undertake any bank acquisitions or mergers during the evaluation period. Several acquisitions relating to asset management businesses and a health savings account portfolio were completed in 2019.

UMB Capital Corporation is a wholly-owned subsidiary of UMB and is a Small Business Investment Company (SBIC) as recognized by the Small Business Administration. This program is intended to bridge the gap between entrepreneurs' need for capital and traditional sources of financing. The SBIC was initially capitalized by UMB in 2015 and further capitalized in 2017 with \$12 million and \$13.9 million in 2019. Kansas City Realty Company, a subsidiary of UMB, holds all of non-bank qualified investments. This company has subsidiary entities, UMB Realty Company, LLC and Kansas City Financial Corporation, that hold mortgage-backed securities and municipal bond investments. These subsidiaries were considered when evaluating CD loans, investments and services.

There are no legal, financial, or other factors that may impede the bank's ability to meet the credit needs in its AAs. UMB was rated "Satisfactory" at the last published CRA examination dated March 27, 2017.

Scope of the Evaluation

Evaluation Period/Products Evaluated

UMB's CRA evaluation period is January 1, 2017, through December 31, 2019. The Lending Test, Investment Test, Service Test, and all CD activity were reviewed using this evaluation period. Primary loan products, for the purpose of this evaluation, are products where the bank originated at least 20 loans within an AA during the evaluation period. In our evaluation of the home mortgages for the Lending Test, we considered and concluded upon home purchase, home refinance, and home improvement loans in aggregate. Multifamily loans meeting the CD definition were considered as part of the evaluation of CD lending.

With an evaluation period end date of December 31, 2019, qualifying activities performed in response to the significant impact of the Coronavirus Pandemic across the United States are not addressed in this evaluation. Bank qualifying activities will be considered in the subsequent evaluation.

Selection of Areas for Full-Scope Review

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

Ratings

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

The Kansas City MMSA received the greatest weight in this evaluation. The rating area accounts for 69.3 percent of the bank's deposits, 32.8 percent of HMDA and CRA reportable loans combined, and 29.7 percent of the bank's branch network. The St. Louis MMSA and state of Colorado received the next greatest weight in the overall ratings. The St. Louis MMSA accounts for 7.1 percent of the bank's deposits, 14.4 percent of HMDA and CRA reportable loans, and 14.9 percent of the bank's branches. The state of Colorado accounts for 7.8 percent of the bank's deposits, 20.9 percent of HMDA and CRA reportable loans, and 11.7 percent of the bank's branch network. The states where overall performance received the next greatest weight are Arizona, Kansas, and Missouri; followed by the states of Nebraska, Oklahoma, and Texas. See the scope of evaluation for each rating area to see which AA's were given the most weight within their respective rating areas. For the lending test we gave equal weight to the HMDA and CRA small business loans when determining rating for the geographical and borrower distribution, except if noted as otherwise in a state's "Scope" section. Small farm loans were considered in AA's where there were 20 or more loans in the evaluation period. To provide a meaningful analysis, we conducted analysis on loan products that had 20 or more loans originated in an AA during the evaluation period.

The MMSA and state ratings are based on performance in all bank AAs, although increased weight was given to full-scope AAs. Refer to the "Scope" section under each State and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Overall Other Performance Data

Lending Test

Nationwide and Regional CD lending - The bank made 14 CD loans, that total \$91.9 million, these loans have a nationwide benefit. The bank's nationwide CD lending primarily benefitted economic development needs. Total nationwide CD loans for economic development totaled \$55.6 million. The remaining \$36.3 million in nationwide CD lending impacted revitalization and stabilization needs. Additionally, the bank made four CD loans, totaling \$26.5 million that benefitted the broader regional area the bank serves. The majority of the regional lending volume was for purchasing LIHTCs, which benefits affordable housing.

Product Innovation and Flexibility - UMB offers several products throughout their AAs that are considered flexible and innovative. UMB offers flexible home mortgage products which include Federal Housing Administration (FHA), Veterans Administration (VA), Fannie Mae's Home Ready (FNMA HR) and Freddie Mac's Home Possible (FHLMC HP) lending programs. FHA and VA loans are considered flexible products due to the fact they require smaller down payments than traditional home mortgage loans. FNMA HR and FHLMC HP loans require smaller down payments, flexible down payment sourcing, and flexible income requirements. Additionally, UMB offers a Consumer Credit Card Thin-File (CCCTF) program to customers with an established UMB bank account. This credit card is innovative due to the fact it uses alternative underwriting requirements for individuals who do not have an established credit history. Refer to the innovative and flexible section in each rating area for more information about these programs and AA use of these programs.

Affordability Analysis – We conducted an affordability analysis for all AAs. Our goal was to determine if either of low- and moderate-income (LMI) borrowers could reasonably afford a home mortgage loan in their respective AA. To determine affordability, we used the median housing value and the median family income found in the respective Table A for each AA. We calculated a mortgage payment based on a mortgage loan with a five percent interest rate, with a 30-year loan amortization. Our analysis concluded that home mortgages were unaffordable if the principle and interest of the payment was in excess of 30.0 percent debt-to-income. This information was used as performance context in the borrower distribution of home mortgage loans when determined to be relevant. See individual AA conclusions for information relating to our determination of affordability.

Investment Test

Nationwide and Regional CD investments – The bank made 23 nationwide CD investments which total \$12.5 million. Community service was the primary need that benefitted from the nationwide CD investments. The bank made nine investments in school bonds that totaled \$11.3 million. The bond funds were used for upgrading schools that primarily served LMI students. The bank also made seven regional CD investments that total \$2.2 million. The primary benefit of the regional CD investments was community service and economic development. The bank made three CD investments in school bonds for \$1.1 million. These bonds benefitted community service by providing funds to schools to upgrade facilities that serve primarily LMI students. Additionally, the bank made four regional CD investments through their affiliate SBIC that benefitted economic development. These four CD investments totaled \$1.1 million.

Service Test

UMB offers several banking products that could benefit LMI individuals and small businesses with the potential to assist the unbanked. These services are available throughout the bank's footprint and will not be described in the state rating areas. UMB did not provide metrics of how these services benefit their LMI customers, thus were not given any weight. Available alternative services are as follows:

- UMB offers various e-banking services. Customers can 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.
- UMB's Digital Genius service, is a video conferencing service, that offers assistance to bank customers who are unsure about using technology. Digital Genius' goal is to ensure customers understand how to access, track, and manage their finances through mobile banking and ATM functions.
- UMB's call center telephone line includes translation services.
- All ATMs have instructions in both English and Spanish.
- UMB provides government check cashing services in all branches for accountholders with no minimum amount for Federal Social Security, Supplemental Security Income, and state checks.

Discriminatory or Other Illegal Credit Practices Review

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

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

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

Multistate Metropolitan Statistical Area Rating

Kansas City MMSA

CRA rating for the Kansas City MMSA¹: Outstanding

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflect good responsiveness to AA credit needs.
- The bank exhibits a good geographical distribution of loans and adequate distribution of loans by income level of the borrower.
- The bank is a leader in providing CD loans. CD lending was responsive to identified affordable housing and economic development needs in the AA. CD lending had a significantly positive impact on the Lending Test rating.
- The bank makes extensive use of innovative and flexible loan products.
- The institution has an excellent level of qualified CD investment and grants, often in a leadership position. CD investments were responsive to identified community needs.
- Bank branches and services are readily accessible to individuals and geographies of different income levels. The bank is a leader in providing CD services.

Description of Institution's Operations in Kansas City MMSA

UMB has one AA within the Kansas City MMSA. This AA includes Johnson and Wyandotte Counties in Kansas and Cass, Clay, Jackson, and Platte Counties in Missouri. This AA complies with CRA regulations and does not arbitrarily exclude LMI geographies.

UMB offers a full range of loan and deposit products and services through 28 full-service branches within the MMSA. Lending is focused on home mortgages and small business loans. The branches represent 30.1 percent of the total branch network. UMB has 32 deposit-taking ATMs. Strong competition exists for financial services within the Kansas City MMSA. According to the June 30, 2019, FDIC Deposit Market Share Report, UMB held \$13.5 billion in deposits and ranked first out of 123 financial institutions, representing a 23.5 percent deposit market share. The Kansas City MMSA accounts for 69.3 percent of bank-wide deposits, 32.9 percent of loan originations, and 27.5 percent of loan volume. The Kansas City MMSA is the most significant AA for UMB. Competition includes large nationwide banks, large regional banks, and community banks.

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

According to the U.S. Bureau of Labor Statistics, as of December 31, 2019, the unemployment rate in the Kansas City MMSA was 3.1 percent, which was lower than the national average of 3.5 percent.

In the Kansas City MMSA, we utilized six contacts with organizations that provide affordable housing, micro small business lending and business incubator, a public library, and economic development corporation to gather community needs. One organization identified the need for more capital and bank loan purchase program. Another identified financial education needs. Another organization identified the lack of aggregated resources for small business owners to have access to including job training resources for individuals. Affordable housing was mentioned by several organizations. One organization specifically mentioned UMB as providing much needed service by use of the legal, information technology, and compliance department resources to vet an online service program. The bank identified many of the same needs by conducting their own research and analysis which also identified job creation, workforce development, healthcare services, and micro lending as needs.

Please refer to the Demographic Information for the state of Missouri in Table A below for detailed demographics and other performance context information.

Table A - Demographic Information of the Assessment Area						
Assessment Area: Kansas City MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	483	16.1	22.2	30.8	26.9	3.9
Population by Geography	1,833,061	9.8	21.4	36.1	32.4	0.3
Housing Units by Geography	786,988	11.6	22.6	36.4	28.9	0.5
Owner-Occupied Units by Geography	464,339	6.2	17.5	38.1	38.0	0.2
Occupied Rental Units by Geography	251,928	17.0	30.3	35.5	16.5	0.7
Vacant Units by Geography	70,721	27.6	28.7	28.3	13.4	1.9
Businesses by Geography	125,119	7.1	18.5	34.3	38.0	2.1
Farms by Geography	3,363	4.3	15.5	41.8	38.1	0.3
Family Distribution by Income Level	461,665	21.2	17.3	20.2	41.2	0.0
Household Distribution by Income Level	716,267	23.5	16.6	17.6	42.3	0.0
Median Family Income MSA - 28140 Kansas City, MO-KS MSA		\$72,623	Median Housing Value			\$163,785
			Median Gross Rent			\$860
			Families Below Poverty Level			9.1%

Source: 2015 ACS Census and 2018 D&B Data
 Due to rounding, totals may not equal 100.0
 (*) The NA category consists of geographies that have not been assigned an income classification.

Scope of Evaluation in Kansas City MMSA

For the Kansas City MMSA, we completed a full-scope review. Within the Kansas City MMSA, home mortgage loans and small business loans made up 56.3 percent and 42.7 percent, respectively, throughout the evaluation period. For the Lending Test, we gave equal weight to HMDA and CRA small business loans. We gave very little weight to small farm lending, considering farm lending is not a strategic focus of the bank in this AA. The bank originated 21 farm loans in this AA during the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS CITY MMSA

LENDING TEST

The bank's performance under the Lending Test in the Kansas City MMSA is rated High Satisfactory.

Lending Activity

Lending levels reflect good responsiveness to the credit needs in its AA, considering the number and amount of competition and the bank's capacity to lend.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Kansas City MMSA	2,049	1,541	21	49	3,660

Dollar Volume of Loans (000'S)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Kansas City MMSA	\$331,197	\$421,024	\$3,450	\$151,965	\$907,636

According to the June 30, 2019, FDIC Deposit Market Share Report, UMB had \$13.6 billion in deposits in the Kansas City MMSA. The bank had a 22.1 percent deposit market share. The bank is ranked first in deposit market share out of 123 deposit-taking institutions.

According to 2018 peer mortgage data, the bank had a 1.1 percent market share of home mortgage loan originations. The bank's market share of home mortgage loan originations was weaker than their deposit market share. The bank ranked 23rd out of 579 mortgage lenders. The bank's market share ranking was in the top 4.0 percent of all home mortgage lenders in the AA. The bank's market share ranking was below their deposit market share ranking.

According to 2018 peer small business data, the bank had a 1.5 percent market of small business loan originations. The bank's market share of small business loan originations was well below their deposit market share. The bank ranked 14th out of 175 lenders originating small business loans. The bank ranked in the top 8.0 percent of lenders originating small business loans. The bank's market share ranking was below their deposit market share ranking. The bank had an 8.5 percent market share of small business loan volume. The volume of the of the bank's lending was below their deposit market share. The volume of the bank's small business lending ranked first in the AA. The bank's rank in small business lending volume was equal to their deposit market share ranking.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Table O in the “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 geographic distribution of home mortgage loans is good.

The percentage of loans in low-income tracts exceeds the aggregate industry distribution of loans in these tracts. Performance is below the percentage of owner-occupied units in low-income geographies. The percentage of loans in moderate-income tracts was near to the aggregate industry distribution of loans and below the percentage of owner-occupied units.

Small Loans to Businesses

Refer to Table Q in the “MMSA” section of appendix D for the facts and data used to evaluate the geographic distribution of the bank’s originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is excellent.

The percentage of loans in low-income geographies exceed both the aggregate industry distribution of loans and the percentage of businesses in these tracts. The percentage of loans in moderate-income tracts is near to both the aggregate industry distribution of loans and the percentage of businesses in those tracts.

Small Loans to Farms

Refer to Table S in the “MMSA” section of appendix D for the facts and data used to evaluate the geographic distribution of the bank’s originations and purchases of small loans to farms.

The geographic distribution of small loans to farms is adequate considering performance context. The bank did not originate or purchase any loans in LMI geographies. We gave consideration to the fact that these loans are not a strategic focus for the bank and were not identified as a credit need in the AA. The bank only originated 21 small loans to farms during the evaluation period.

The percentage of bank loans in low-income geographies is below both the aggregate industry distribution of loans and farms in low-income tracts. In moderate-income geographies, performance is below aggregate industry lending and significantly below the percent of farms located in these CTs.

Lending Gap Analysis

We reviewed supervisory data and other summary reports. We did not identify any unexplained conspicuous gaps in the bank’s lending.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table P in the “Kansas City MMSA” section of appendix D for the facts and data used to evaluate the borrower distribution of the institution’s home mortgage loan originations and purchases.

The borrower distribution of home mortgage loans is good.

The percentage of loans to low-income borrowers exceeds the aggregate industry distribution of loans to these borrowers. UMB’s percentage of these loans is significantly below the percentage of low-income families in the AA. The percentage of loans to moderate-income borrowers is below the aggregate industry distribution of loans to these borrowers and near to the percentage of moderate-income families.

Small Loans to Businesses

Refer to Table R in the “MMSA” section of appendix D for the facts and data used to evaluate the borrower distribution of the institution’s originations and purchases of small loans to businesses.

The overall borrower distribution of small loans to businesses is adequate. We gave consideration to the fact that bank did not collect revenue information on 11.7 percent of the small loans to businesses originated or purchased in the Kansas City MMSA.

The percentage of small loans to business with gross annual revenue of \$1 million or less was below the aggregate industry distribution of loans to these businesses. Performance compared to demographics is significantly below the percentage of small businesses in the AA.

Small Loans to Farms

Refer to Table T in the “MMSA” section of appendix D for the facts and data used to evaluate the borrower distribution of the institution’s originations and purchases of small loans to farms.

The borrower distribution of small loans to farms is good considering performance context. We gave consideration to the fact that these loans are not a strategic focus for the bank and were not identified as a credit need in the AA. The bank only originated 21 small loans to farms during the evaluation period. Revenue was not available on 31.3 percent of small loans to farms.

The percentage of small loans to farms with gross annual revenue of \$1 million or less exceeds the aggregate industry distribution of loans to these farms. UMB’s performance compared to demographics is significantly below the percentage of small farms in the AA.

Community Development Lending

The institution is a leader in making CD loans in the Kansas City MMSA. CD lending had a significantly positive impact on its lending performance in the AA.

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

CD loans were excellent and responsive in helping the bank address community credit needs. UMB originated 49 qualified CD loans totaling \$152.0 million. This volume represented 15.4 percent of allocated tier 1 capital during the evaluation period. UMB's CD loans demonstrated excellent responsiveness to AA needs, concentrating on economic development, community services to LMI individuals, and affordable housing. Several of the bank's CD loans exhibited leadership, complexity, and/or innovation.

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

- A \$4.2 million loan for a New Markets Tax Credit to a Community Development Corporation. UMB led the initiative to provide the funding and acts as the source lender. This loan promoted economic development and exhibited leadership.
- A \$4.3 million construction loan that qualified for Low-Income Housing Tax Credits (LIHTC). The loan will fund a 24-unit property for affordable housing for the senior citizen population. This loan was responsive to identified community needs and was a complex transaction to complete.
- A \$1.9 million loan to support a local non-profit. The non-profit focuses on providing services to low-income seniors and those with disabilities free-of-charge.

Product Innovation and Flexibility

The institution makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank made 112 mortgage loans and 73 credit cards considered either flexible or innovative within the Kansas City MMSA. The bank's 55 FHA loans and 28 VA loans were the flexible home mortgage programs most utilized within the AA. UMB also provided eight home mortgage loans as part of the Missouri Housing Development Commission, this program provides cash assistance to first time home buyers in need of down payment assistance or lower interest rates for borrowers that have a down payment. Additionally, the bank originated 73 CCCTFs for bank customers.

INVESTMENT TEST

The institution's performance under the Investment Test in the Kansas City MMSA is rated Outstanding.

The institution has an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors. The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments and Grants										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Kansas City MMSA	31	\$30,330	233	\$100,240	264	100.0	\$130,570	100.0	0	\$0

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

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

UMB had 264 investments and grants totaling approximately \$130.6 million. This includes 31 prior period investments totaling \$30.3 million and 56 current period investments totaling \$97.7 million. Additionally, 177 grants totaling \$2.6 million were made for a total investment in the AA of approximately \$130.6 million. UMB's total investments represented 13.2 percent of allocated tier 1 capital.

Examples of investments made during the evaluation period include:

- A LIHTC bond for \$6.8 million, in combination with a construction financing loan, to construct a 40-unit multifamily property providing the community with affordable housing. These types of bonds are typically considered to be complex and require specialized knowledge and expertise to execute.
- A Tax Anticipation Note (TAN) Bond for \$3.5 million to provide short-term gap financing to a local school district. A TAN Bond is issued to provide funds in anticipation of payment through revenues of the school district that are derived from taxes for school purposes. All of the students (100 percent) within this school district are eligible for free or reduced lunches. UMB displayed a leadership position by underwriting and purchasing this bond.

Additionally, UMB provided a grant for \$1.1 million to an organization that provides interactive, reality-based educational experiences that prepare students to understand and apply basic marketplace concepts and skills and exposes them to business-related careers. The students attend local schools where the majority of all the students are eligible for free or reduced lunches.

SERVICE TEST

The institution's performance under the Service Test in the Kansas City MMSA is rated Outstanding.

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

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Kansas City MMSA	100.0	28	100.0	7.1	25.0	42.9	25.0	9.8	21.4	36.1	32.4

The branch distribution is readily accessible in the Kansas City MMSA. UMB operates 28 full-service branches and 33 deposit-taking ATMs in the Kansas City MMSA. The bank has two branches in low-income geographies, seven branches in the moderate-income geographies, 12 in middle-income geographies, and seven branches in upper-income geographies. The percentages of UMB’s branches in moderate-income geographies exceeds the percentage of population living in these geographies. In addition, 30.3 percent of the bank’s deposit-taking ATMs are in moderate-income geographies. UMB’s percentage of branches in low-income geographies is somewhat near to the percentage of population living in low-income geographies. Additionally, the bank had four branches near to moderate-income CTs and two branches near to low-income CTs. Bank data demonstrated that these branches are providing services to LMI individuals and geographies.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings		Net change in Location of Branches (+ or -)			
	# of Branch Openings	# of Branch Closings	Low	Mod	Mid	Upp
Kansas City MMSA	0	3	0	-1	-2	0

The institution’s opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. UMB closed three branches during the evaluation period, one in a moderate-income geography on September 22, 2017, and two in middle-income geographies, one July 28, 2017, and one September 21, 2018, respectively. A bank analysis indicated closure of these branches would enable the bank to achieve operational savings and service their customers in nearby branches. UMB has not opened any branches in the Kansas City MMSA during this evaluation period.

Banking products and services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals.

Other services specifically for the Kansas City MMSA include collaboration with government and community partners:

- In 2018, UMB offered a Value Checking Partnership with Next Step KC, a nonprofit organization to offer Free Online Banking for all Small Dollar Loan participants.

- UMB offers an Individual Development Accounts (IDA) with Partnership with the United Way of Greater Kansas City. IDAs are a social innovation that expands economic opportunity by creating assets for in low-income households. IDAs are matched savings accounts that help families of modest means to save towards the purchase of a lifelong asset. The minimum opening deposit is \$25; the account earns interest with no service charges. From 2017-2019, UMB opened 28 new IDA accounts.

Community Development Services

The institution is a leader in providing CD services. Organizations benefiting from the bank's CD services were involved in a variety of community development activities. CD services in the Kansas City MMSA include 128 individuals participating in 223 activities, performing 5,512 hours of community service related activities at 62 organizations; 122 individuals participating in 162 activities, performing 3,088 hours of economic development related activities at 13 organizations; 10 individuals participating in 19 activities, performing 138 hours of revitalization/stabilization related activities at seven organizations; and seven individuals participating in 13 activities, performing 131 hours of affordable housing related activities at seven organizations; for a total of 267 individuals participating in 417 activities, performing 8,869 community development volunteer service hours.

In the Kansas City MMSA, 180 employees provided their expertise in non-leadership roles to CD organizations for a total of 2,628 hours. Sixty-six additional bank staff members served either as directors, committee members, or officers to various CD organizations for a total of 6,252 hours. The following are examples of some of the CD services provided in the AA:

- During the evaluation period, 110 employees provided financial education instruction, and some served as board members, to an organization that provides high quality, reality based educational experiences that prepare LMI students to understand and apply basic marketplace concepts and skills, for a total of 2,852 hours.
- During the evaluation period, 11 employees provided financial education, including teaching students how to budget income to purchase food, to LMI elementary school students. Three of the employees served as board members. The organization's mission is to impact the future of agriculture through competitive learning, scholarships, education, and agriculture events, for a total of 841 hours.

Multistate Metropolitan Statistical 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: High Satisfactory

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

The major factors that support this rating include:

- Lending levels reflect good responsiveness to credit needs.
- The bank has an adequate geographical and borrower distribution of loans.
- The bank is leader providing CD loans. CD lending had a positive impact on the Lending Test rating. CD lending was responsive to identified community needs.
- The bank had an excellent level on CD investment activity that was responsive to identified community needs.
- Service delivery systems are accessible to geographies and individuals of different income levels.

Description of Institution's Operations in St. Louis MMSA

UMB has one AA within the St. Louis MMSA. The St. Louis MMSA consists of Madison and St. Clair Counties in Illinois and St. Louis City, St. Louis, St. Charles, and Jefferson Counties in Missouri. This AA complies with CRA regulations and does not arbitrarily exclude LMI geographies.

UMB offers a full range of loan and deposit products and services through 14 full-service branches within the St. Louis MMSA. Lending is focused on home mortgage and small business loans. The branches represent 15.1 percent of the total branch network. UMB has 15 deposit-taking ATMs. Strong competition exists for financial services within the St. Louis MMSA. According to the June 30, 2019, FDIC Deposit Market Share Report, UMB held \$1.4 billion in deposits and ranked 15th out of 124 financial institutions, representing a 1.6 percent market share. During the evaluation period the St. Louis MMSA accounted for 7.1 percent of bank-wide deposits and 14.4 percent of total loan originations. Competition includes large regional banks, large nationwide institutions, and community banks.

According to the U.S. Bureau of Labor Statistics, as of December 31, 2019, the unemployment rate in the St. Louis MMSA was 3.3 percent, which was lower than the national average of 3.5 percent.

To help identify needs and opportunities in the St. Louis MMSA, the OCC utilized two regulatory agency contacts. One organization provides economic development information to support local communities. This support includes training and workshops, assists with applications and grants, and aids in collaboration for opportunities regarding affordable housing. The first organization identified needs for small business micro loans and loans of less than \$50,000. The second organization was focused on community services by administering grant programs for new construction, homebuyer assistance, and housing rehabilitation. The second organization identified the primary credit needs are for small business loans and home mortgages with a focus on home-buyer assistance programs

Please refer to the Demographic Information for the St. Louis MMSA in Table A below for detailed demographics and other performance context information.

Table A - Demographic Information of the Assessment Area

Assessment Area: St. Louis MMSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	547	14.4	21.4	32.9	30.5	0.7
Population by Geography	2,449,944	9.9	19.7	35.7	34.4	0.3
Housing Units by Geography	1,083,823	11.4	21.0	35.6	31.7	0.3
Owner-Occupied Units by Geography	663,559	5.7	17.6	38.0	38.7	0.1
Occupied Rental Units by Geography	308,161	18.1	26.3	33.6	21.3	0.6
Vacant Units by Geography	112,103	27.1	26.6	27.1	18.8	0.3
Businesses by Geography	149,275	6.5	18.2	32.8	41.4	1.0
Farms by Geography	3,888	2.8	13.8	42.3	40.8	0.4
Family Distribution by Income Level	624,598	21.7	16.9	19.6	41.8	0.0
Household Distribution by Income Level	971,720	24.2	15.9	17.3	42.6	0.0
Median Family Income MSA - 41180 St. Louis, MO-IL MSA		\$70,718	Median Housing Value			\$166,734
			Median Gross Rent			\$840
			Families Below Poverty Level			9.8%

Source: 2015 ACS Census and 2018 D&B Data

Due to rounding, totals may not equal 100.0

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

Scope of Evaluation in St. Louis MMSA

We completed a full-scope review in the St. Louis MMSA. Of the loans originated in the St. Louis MMSA throughout the evaluation period, 41.9 percent were home mortgage loans and 58.1 percent were small business loans. For the Lending Test, we gave slightly more weight to performance in small business lending.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ST. LOUIS MMSA

LENDING TEST

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

Lending Activity

Lending levels reflect good responsiveness to the credit needs in its AA, considering the number and amount of competition and the bank's capacity to lend.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
St. Louis MMSA	663	920	1	18	1,602

Dollar Volume of Loans (000's)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
St. Louis MMSA	\$133,854	\$281,407	\$10	\$41,935	\$457,206

According to the June 30, 2019, FDIC Deposit Market Share Report, UMB had \$41.4 billion in deposits in the St. Louis MMSA. The bank had a 1.6 percent deposit market share. The bank's deposit market share ranked 15th out of 124 deposit-taking institutions. The bank's deposit market share ranked in the top 12.1 percent for deposit market share in the AA.

According to 2018 peer mortgage data, the bank had 0.3 percent market share home mortgage loan originations. The bank's market share of home mortgage loan originations was well below their deposit market share. The bank ranked 73rd out of 614 home mortgage lenders. The bank's home mortgage loan origination market share ranking was in the top 11.9 percent of all lenders in the AA. The bank's home mortgage market share ranking was stronger than their deposit market share ranking.

According to 2018 peer small business data, the bank has 0.6 percent market share of small business loan originations. The bank's market share of small business loan originations was well below their deposit market share. The bank ranked 25th out of 157 small business lenders in the AA. The bank's market share ranking was in the top 15.9 percent of all lenders originating small business loans. The bank's market share ranking was weaker than their deposit market share ranking. The bank had a 4.0 percent of small business loan volume. The bank's small business loan volume was stronger than their deposit market share. The bank's small business loan volume ranked eighth and was in the top 5.3 percent of lenders for small business loan volume. The bank ranking for small business loan volume was stronger than their deposit market share ranking.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Table O 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 geographic distribution of home mortgage loans is poor. We gave consideration to the fact that rental and vacant units in low-income tracts are 45.1 percent and 24.6 percent, respectively. Lending in moderate-income geographies carried more weight due to limited lending opportunities in low-income geographies.

The percentage of loans in low-income tracts is below both the aggregate industry distribution of loans in these tracts and the percentage of owner-occupied units in these tracts. The percentage of loans in moderate-income tracts is significantly below both the aggregate industry distribution of loans and the percentage of owner-occupied units in those geographies.

Small Loans to Businesses

Refer to Table Q in the "MMSA" section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is excellent.

The percentage of loans in both LMI geographies exceed both the aggregate industry distribution of loans and the percentage of businesses in these tracts.

Lending Gap Analysis

We reviewed supervisory data and other summary reports. We did not identify any conspicuous gaps in the bank's lending.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table P in the "MMSA" section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The borrower distribution of home mortgage loans is good. We gave consideration to the fact that housing is not affordable for low-income individuals

The percentage of loans to low-income borrowers equals the aggregate industry distribution of loans to these borrowers and is significantly below the percentage of low-income families in the AA. The percentage of loans to moderate-income borrowers is below the aggregate industry distribution of loans and near to the percentage of moderate-income families in the AA.

Small Loans to Businesses

Refer to Table R in the "MMSA" section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of small loans to businesses is poor. The percentage of small loans to businesses with gross annual revenue of \$1 million or less is significantly below both the aggregate industry distribution loans to these businesses and the percentage of small businesses in the AA.

Community Development Lending

The institution is a leader in making CD loans. UMB's CD lending had a significantly positive impact on its lending performance in the AA.

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

CD loans demonstrated good responsiveness to AA needs. UMB originated 18 qualified CD loans totaling \$41.9 million. This volume represented 16.5 percent of allocated tier 1 capital, concentrating in economic development and community services to LMI individuals.

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

- Three loans totaling \$12.2 million under the SBA 504 loan program. These loans provide approved small businesses with long-term, fixed rate financing used to purchase fixed assets for expansion or modernization.
- A \$1.0 million loan to purchase and rehabilitate residential housing units located in LMI CTs. All tenants are LMI. A portion of loan proceeds were also used to acquire a vacant building for rehabilitation to assist women formerly in the criminal justice system with transitional housing and prevent homelessness.
- A \$1.3 million loan to an entity that provides comprehensive healthcare in the community. The organization is committed to providing comprehensive primary health care to impoverished and uninsured populations.

Product Innovation and Flexibility

The institution makes limited-use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank originated 10 home mortgage loans that are considered flexible. Flexible home mortgage products originated in the AA included FHA, FMNA HR, and VA loans. Innovative products included providing 17 CCCTF to bank customers in the AA.

INVESTMENT TEST

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

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

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

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

Number and Amount of Qualified Investments

Qualified Investments and Grants										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000’s)	#	\$(000’s)	#	% of Total #	\$(000’s)	% of Total \$	#	\$(000’s)
St. Louis MMSA	28	\$9,662	53	\$9,636	81	100.0	\$19,298	100.0	0	0

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

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

UMB made 81 investments and grants totaling approximately \$19.3 million. This includes 28 prior period investments totaling \$9.7 million and seven current period investments totaling \$9.4 million. Additionally, 46 grants totaling \$235 thousand were also made for a total investment in the AA of approximately \$19.3 million. UMB's total investments represented 7.6 percent of allocated tier 1 capital. UMB's CD investments were responsive to affordable housing needs. Additionally, UMB's investments were complex and demonstrated leadership.

Examples of investments made during the evaluation period include:

- Mortgage Backed Security (MBS) for \$2.6 million containing 21 mortgage loans that were extended to LMI borrowers with properties located throughout the AA.
- A school bond for \$1.5 million to improve and renovate various schools within the district and to relocate and renovate the school district's central office. The majority of the students within this school district are eligible for free or reduced lunches. UMB displayed a leadership position by underwriting and purchasing this bond.

Additionally, UMB provided a grant for \$25 thousand to an organization that partners with other local organizations to purchase and renovate homes in the AA, providing families in need a safe and stable home. In return, these families pay an affordable rent, attend quarterly seminars that focus on the needs of their families, and volunteer in the community 2-4 hours per month.

SERVICE TEST

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

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

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
St. Louis MMSA	100.0	14	100.0	0.0	35.9	21.4	42.7	9.9	19.7	35.7	34.4

The branch distribution is accessible to portions of the St. Louis MMSA. UMB operates 14 branches and 15 deposit-taking ATMs in the St. Louis MMSA. The percentages of UMB's branches in moderate-income geographies significantly exceeds the percentage of population living in these geographies. In addition, 33.3 percent of the bank's ATMs are in moderate-income geographies. The bank does not have any branches nor any ATMs in low-income geographies.

Distribution of Branch Openings/Closings						
Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
St. Louis MMSA	0	1	0	0	0	-1

The institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.

UMB did not opened any branches in the St. Louis MMSA AA during this evaluation period. UMB closed one branch in an upper-income geography. A bank analysis indicated closure of these branches would enable the bank to achieve operational savings and service their customers in nearby branches.

Bank products and services, including where appropriate, business hours, do not vary in a way that inconveniences, the various portions of its AA, particularly LMI geographies and/or individuals.

Refer to the Scope of Evaluation section for information about alternative delivery systems. We did not place significant weight on these alternative delivery systems, as the bank did not maintain metrics to determine their effectiveness in helping meet the needs of LMI individuals or small businesses.

Community Development Services

The institution provides an adequate level of CD services. UMB employees participated in 30 activities performing 393 community development volunteer service hours. CD services in the St. Louis MMSA include 16 individuals participating in 22 activities, performing 281 hours of community service-related activities at 15 organizations; one individual participating in seven activities, performing 80 hours of affordable housing related activities at two organizations; and one individual participating in one activity, performing 32 hours of economic development related activities at one organization

In the St. Louis MMSA, eight employees provided their expertise in non-leadership roles to CD organizations for a total of 160 hours. Eleven bank staff members served either as directors, committee members, or officers to various CD organizations for a total of 233 hours. The following are examples of some of the CD services provided in the AA:

- One employee served as a board member and treasurer for a non-profit organization whose focus is to provide affordable housing to persons that are currently homeless, very low income, and people that are suffering from mental illness for a total of 72 hours.

One employee provided 52 service hours to a non-profit organization that focuses on providing financial education to LMI individuals.

State Rating

State of Arizona

CRA rating for the State of Arizona: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Needs to Improve

The Service Test is rated: Needs to Improve

The major factors that support this rating include:

- Lending Levels reflect good responsiveness to credit needs.
- The bank has good geographic distribution of loans and poor borrower distribution of loans.
- The bank is a leader in making CD loans. CD loans were responsive to identified community needs. CD lending had a significantly positive impact on the Lending Test rating.
- The bank had a poor level of CD investments. Bank CD investments were not responsive to identified community needs.
- Branch distribution is unreasonably inaccessible to portions of the AA.

Description of Institution's Operations in Arizona

UMB has one AA within the Phoenix MSA. This AA consists of Maricopa County in Arizona. This AA complies with CRA regulations and does not arbitrarily exclude LMI geographies.

UMB offers a full range of loan and deposit products and services through seven full-service branches within the MSA. Lending is focused on home mortgage and small business loans. The branches represent 7.5 percent of the total branch network. UMB has six deposit-taking ATMs. Strong competition exists for financial services within the Phoenix MSA. According to the June 30, 2019, FDIC Deposit Market Share Report, UMB held \$846.7 million in deposits and ranked 13th out of 62 financial institutions, representing a 0.8 percent market share. During the evaluation period, 4.3 percent of bank deposits, 7.1 percent of bank loan originations, and 9.2 percent by dollar volume of loan originations were in the Phoenix MSA. Competition includes large regional banks, large nationwide institutions, and community banks. The top five competitors have 77.2 percent of the deposit market share within this AA.

According to the U.S. Bureau of Labor Statistics, as of December 31, 2019, the unemployment rate in the Phoenix MSA was 3.6 percent, which was higher than the national average of 3.5 percent.

To help identify needs and opportunities in the Phoenix MSA, the OCC utilized one contact that is a NeighborWorks member organization identified mortgage loans and small business loans as the primary credit need in Maricopa County. Micro lending is also a need that is not being met in the area. UMB also identified micro lending, financial education and safe and affordable products as needs in the market area.

Please refer to the Demographic Information for the Phoenix MSA in Table A below for detailed demographics and other performance context information.

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	916	11.5	22.5	31.2	33.4	1.4
Population by Geography	4,018,143	11.1	22.9	31.3	34.4	0.3
Housing Units by Geography	1,668,555	9.8	23.4	33.3	33.4	0.1
Owner-Occupied Units by Geography	875,327	4.6	18.8	34.7	41.9	0.0
Occupied Rental Units by Geography	567,191	17.1	29.4	31.2	21.9	0.3
Vacant Units by Geography	226,037	11.8	25.6	33.2	29.3	0.2
Businesses by Geography	338,459	6.6	16.3	28.3	48.3	0.6
Farms by Geography	6,517	5.7	18.4	29.6	45.9	0.3
Family Distribution by Income Level	945,115	21.8	16.9	19.2	42.2	0.0
Household Distribution by Income Level	1,442,518	23.3	16.3	17.7	42.7	0.0
Median Family Income MSA - 38060 Phoenix-Mesa-Chandler, AZ MSA		\$63,686	Median Housing Value			\$203,811
			Median Gross Rent			\$993
			Families Below Poverty Level			12.6%
<i>Source: 2015 ACS Census and 2018 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Arizona

We completed a full-scope review in the Phoenix MSA. Of the loans originated in the Phoenix MSA throughout the evaluation period, 49.9 percent were home mortgage loans and 49.1 percent were small business loans.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ARIZONA

LENDING TEST

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

Lending Activity

Lending levels reflect good responsiveness to AA credit needs, considering the number and amount of competition and the bank's capacity to lend.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Phoenix MSA	392	389	4	8	793	100.0	100.0

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

Dollar Volume of Loans* (000's)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State*	%State Deposits
Phoenix MSA	\$126,835	\$123,829	\$715	\$30,580	\$281,959	100.0	100.0

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

According to the June 30, 2019, FDIC Deposit Market Share Report, UMB had \$846.7 million in deposits in the Phoenix MSA. The bank's deposit market share was 0.8 percent. The bank's deposit market share ranked 13th out of 62 deposit-taking institutions. The bank's deposit market share ranked in the top 21.0 percent in the AA.

According to 2018 peer mortgage data, UMB had 0.1 percent market share of home mortgage loan originations. The bank's market share of home mortgage loan originations was weaker than their deposit market share. The bank ranked 156th out of 853 lenders originating home mortgage loans in the AA. The bank ranked in the top 18.3 percent of all home mortgage loan originators. The bank's home mortgage loan origination ranking was stronger than their deposit market share ranking.

According to 2018 peer small business data, UMB had a 0.1 percent market share of small business loan originations. The bank's market share of small business loan originations was weaker than their deposit market share. The bank ranked 38th out of 195 lenders originating small business loans in the AA. The bank ranked in the top 19.5 percent of all lenders originating small business loans. The bank's rank in small business loan originations was stronger than their deposit market share ranking. The bank had a 1.4 percent market share of small business loan volume. The bank's market share of small business loan volume ranked 18th and was in the top 9.2 percent of all small business lenders. The bank's market share and market share ranking of small business loan volume was stronger than their deposit market share and deposit market share ranking.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in the Phoenix MSA.

Home Mortgage Loans

Refer to Table O 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 and purchases.

The geographic distribution of home mortgage loans is adequate. We gave consideration to the fact that rental and vacant units in low-income tracts are 59.4 percent and 16.3 percent, respectively. Lending in moderate-income geographies carried more weight due to limited lending opportunities in low-income geographies.

The percentage of loans in low-income tracts is significantly below both the aggregate industry distribution of loans and the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income tracts is below the aggregate industry distribution of loans and significantly below the percentage of owner-occupied units in these geographies.

Small Loans to Businesses

Refer to Table Q in the state of Arizona section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is excellent.

The percentage of loans in LMI geographies exceeds the aggregate industry distribution of loans and the percentage of businesses in these tracts.

Lending Gap Analysis

We reviewed supervisory data and other summary reports. We did not identify any conspicuous gaps in the bank's lending.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a poor distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table P 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 borrower distribution of home mortgage loans is poor. We gave consideration to the fact that housing is not affordable for low-income individuals.

The percentage of loans to LMI borrowers is significantly below both the aggregate industry distribution of loans to these borrowers and the percentage of LMI families in the AA, respectively.

Small Loans to Businesses

Refer to Table R 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 borrower distribution of small loans to businesses is poor.

The percentage of small loans to businesses with gross annual revenue of \$1 million or less is significantly below both the aggregate industry distribution loans to these businesses and the percentage of small businesses in the AA.

Community Development Lending

The institution is a leader in making CD loans. The level of CD loans in the Phoenix MSA had a significantly positive impact on the institution's lending performance.

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

During the evaluation period, the bank originated eight qualified CD loans, for a total of \$30.6 million. This volume represented 21.1 percent of allocated tier 1 capital. UMB's CD loans demonstrated excellent responsiveness to AA needs, and concentrated on affordable housing and revitalization.

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

- A \$24.0 million participation loan to construct a 349-unit apartment complex located in a moderate-income CTs and is situated in a redevelopment area established by the State of Arizona.
- Two loans totaling \$2.6 million for multi-family housing properties. The properties provide affordable housing to LMI individuals.

Product Innovation and Flexibility

The institution makes little use of innovative and/or flexible lending practices in order to serve AA credit needs.

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

The institution has a poor level of qualified CD investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits poor responsiveness to credit and community economic development needs. The institution does not use innovative and/or complex investments to support CD initiatives.

Qualified Investments and Grants										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Phoenix MSA	3	\$3,769	18	\$1,529	21	100.0	\$5,298	100.0	0	0

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

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

UMB made 21 investments and grants totaling approximately \$5.3 million. This includes three prior period investments totaling \$3.8 million and one current period investment equaling \$1.4 million. Additionally, 17 grants totaling \$100 thousand were also made for a total investment in the AA of approximately \$5.3 million. CD investments and grants were equivalent to 3.7 percent of allocated tier 1 capital.

The bank's qualified investments in the AA included an MBS for \$1.4 million containing six mortgage loans that were extended to LMI borrowers with properties located throughout the AA. Additionally, UMB provided two grants within the evaluation period totaling \$18 thousand to an organization that offers an online platform to provide financial education to grade school level students. The program educates the students on topics such as saving, banking, credit cards, and interest rates. The students attend local schools where the majority of students are eligible for free or reduced lunches.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

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

Does not add to 100 percent due to N/A census tracts

The branch distribution is unreasonably inaccessible to significant portions of the Phoenix MSA, particularly in LMI geographies and/or to LMI individuals. UMB operates seven branches and six deposit-taking ATMs in the Phoenix MSA. None of UMB's branches or deposit-taking ATMs are located in LMI geographies. The percentages of branches in LMI geographies are significantly below

the percentage of populations residing in these geographies. The bank has two branches that are near to a moderate-income geography. Bank data indicates that this branch reasonably serves nearby LMI geographies and individuals.

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

UMB did not open or close any branches during the evaluation period in this AA. Bank products and services, including where appropriate, business hours, do not vary in a way that inconveniences, the various portions of its AA, particularly LMI geographies and/or individuals.

Refer to the Scope of Evaluation section for information about alternative delivery systems. We did not place significant weight on these alternative delivery systems, as the bank did not maintain metrics to determine their effectiveness in helping meet the needs of LMI individuals or small businesses.

Community Development Services

The institution provides a relatively high level of CD services. CD services in the Phoenix MSA include six individuals participating in 12 activities, performing 799 hours of community service-related activities at seven organizations.

In the Phoenix MSA, two employees provided their expertise in non-leadership roles to CD organizations for a total of 52 hours. Four additional bank staff members served either as directors, committee members, or officers to various CD organizations for a total of 747 hours. The following are examples of some of the CD services provided in the AA:

- Two employees served as board members for an organization that primarily serves individuals earning less than the LMI threshold, for a total of 296 hours. The organization raises money for local children’s charities through two main fundraising events in the spring and the fall.
- One employee served as a board member to a non-profit organization that enables all young people, the majority of which are from LMI households, to reach their full potential as productive, caring, responsible citizens. The employee provided 246 service hours by serving on the board and by providing technical assistance to the finance committee, audit committee, share services committee, and executive committee.

State Rating

State of Colorado

CRA rating for the State of Colorado: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflect good responsiveness to AA credit needs.
- The bank exhibits a good geographical distribution of loans and a poor borrower distribution of loans.
- The bank is a leader in providing CD loans in the state of Colorado. CD lending was responsive to identified community needs. CD lending had a significantly positive impact on the Lending Test rating
- The bank had an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.
- Service delivery systems are readily accessible to geographies and individuals of different income levels.
- The bank provides a relatively high level of CD services.

Description of Institution's Operations in Colorado

UMB has two AAs within the state of Colorado. These AAs include the Denver MSA comprised of Adams, Arapahoe, Denver, Douglas, and Jefferson Counties and the Colorado Springs MSA comprised of El Paso County. These AAs comply with CRA regulations and do not arbitrarily exclude LMI geographies.

UMB offers a full range of loan and deposit products and services through 11 full-service branches within Colorado. Lending is focused on home mortgage and small business loans. The branches represent 11.9 percent of the total branch network. UMB has 11 deposit-taking ATMs in Colorado with six in the Denver MSA and five in the Colorado Springs MSA. As of June 30, 2019, UMB held \$1.5 billion in statewide deposits and ranked 17th in the state out of 131 institutions, representing a 1.1 percent market share. During the evaluation period 7.8 percent of bank deposits, 22.2 percent of loan volume, and 20.9 percent of loan originations were in Colorado. In Colorado, the ratings in the Denver MSA were given more weight due to the fact it has the majority of deposits and loans in the state. The Denver MSA accounted for 78.3 percent of statewide deposits, 81.8 percent of loan volume, and 87.0 percent of loan originations in UMB AAs in Colorado.

Colorado Springs MSA

Strong competition exists within the Colorado Springs MSA. According to the June 30, 2019, FDIC Deposit Market Share Report, UMB ranked sixth of 37 depository financial institutions in the AA with a four percent market share and \$330.4 million in deposits. Competition includes large regional banks along with several institutions with a nationwide presence. The top five competitors control 62.4 percent of the deposit market share within this AA.

According to the U.S. Bureau of Labor Statistics, as of December 31, 2019, the unemployment rate in the Colorado Springs MSA was 2.3 percent, which was lower than the national average of 3.5 percent.

To help identify needs and opportunities in the Colorado Springs MSA, the OCC utilized one contact that is an economic development organization that states workforce development, providing volunteers to help with “upskilling” programs as a need in the community.

Please refer to the Demographic Information for the Colorado Springs MSA in Table A below for detailed demographics and other performance context information.

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	130	5.4	30.8	38.5	23.8	1.5
Population by Geography	655,024	4.7	26.8	39.7	27.4	1.4
Housing Units by Geography	261,745	5.3	28.8	39.2	26.7	0.0
Owner-Occupied Units by Geography	153,354	3.3	20.7	42.2	33.8	0.0
Occupied Rental Units by Geography	91,933	8.1	41.5	35.1	15.3	0.1
Vacant Units by Geography	16,458	7.6	34.5	33.5	24.4	0.0
Businesses by Geography	57,277	7.4	23.3	33.1	36.0	0.2
Farms by Geography	1,434	5.9	21.0	43.0	29.9	0.1
Family Distribution by Income Level	168,103	20.4	18.5	20.3	40.8	0.0
Household Distribution by Income Level	245,287	22.7	16.7	19.0	41.6	0.0
Median Family Income MSA - 17820 Colorado Springs, CO MSA		\$71,351	Median Housing Value			\$224,065
			Median Gross Rent			\$987
			Families Below Poverty Level			8.4%

*Source: 2015 ACS Census and 2018 D&B Data
Due to rounding, totals may not equal 100.0
(* The NA category consists of geographies that have not been assigned an income classification.*

Denver MSA

Strong competition exists for financial services within the Denver MSA. According to the June 30, 2019, FDIC Deposit Market Share Report, UMB ranked 13th of 66 depository financial institutions in the AA, with a 1.4 percent market share and \$1.2 billion in deposits. Competition includes large regional banks, large nationwide institutions, and community banks. The top five competitors control 69.9 percent of the deposit market share within this AA. The Denver MSA has 1,992 total loans or 87.0 percent of total HMDA and CRA small business loan originations in the state.

According to the U.S. Bureau of Labor Statistics, as of December 31, 2019, the unemployment rate in the Denver MSA was 2.3 percent, which was lower than the national average of 3.5 percent.

To help identify needs and opportunities in the Denver MSA, the OCC utilized two community contacts. One contact provides affordable housing services and the other is an economic development organization. The organizations identified small business lending for start-ups, participation agreements, and investment in tax exempt mortgage bonds supporting affordable housing for LMI individuals. UMB's internal assessment identified affordable housing, financial education, job creation, and training as community needs.

Please refer to the Demographic Information for the Denver MSA in Table A below for detailed demographics and other performance context information.

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	587	8.7	25.0	32.0	33.4	0.9
Population by Geography	2,588,488	9.1	25.0	32.2	33.6	0.1
Housing Units by Geography	1,048,213	8.7	24.4	33.7	33.2	0.0
Owner-Occupied Units by Geography	623,986	4.8	19.4	33.7	42.1	0.0
Occupied Rental Units by Geography	372,043	14.6	32.4	33.8	19.1	0.0
Vacant Units by Geography	52,184	12.2	26.4	33.0	28.4	0.0
Businesses by Geography	288,710	6.8	18.7	31.5	42.7	0.4
Farms by Geography	5,659	7.7	19.0	31.6	41.3	0.3
Family Distribution by Income Level	627,437	21.6	17.5	20.4	40.5	0.0
Household Distribution by Income Level	996,029	23.7	16.6	18.2	41.5	0.0
Median Family Income MSA - 19740 Denver-Aurora-Lakewood, CO MSA		\$80,820	Median Housing Value			\$280,595
			Median Gross Rent			\$1,067
			Families Below Poverty Level			8.2%

*Source: 2015 ACS Census and 2018 D&B Data
Due to rounding, totals may not equal 100.0
(* The NA category consists of geographies that have not been assigned an income classification.*

Scope of Evaluation in Colorado

For the state of Colorado, we completed full-scope reviews for the Denver MSA and the Colorado Springs MSA. UMB's performance in the Denver MSA is weighted most heavily in arriving at the overall conclusion for the state, as it provides the largest share of loans and deposits amongst the full-scope AAs. Of the HMDA and CRA small business loans that were originated in Colorado throughout the evaluation period, 87.0 percent of loan originations and 81.8 percent of the dollar volume of loans were in the Denver MSA. UMB had \$1.5 billion in deposits in Colorado, of which 78.3 percent were in the Denver MSA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN COLORADO

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews the bank's performance in the Colorado Springs MSA is good. The bank's performance in the Denver MSA is poor.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs, considering the number and amount of competition and the bank's capacity to lend.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Colorado Springs MSA	167	131	1	1	300	13.0	21.7
Denver MSA	1,000	992	5	9	2,006	87.0	78.3
Statewide	0	0	0	1	1	0.0	0.0

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

Dollar Volume of Loans* (000's)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Colorado Springs MSA	\$80,703	\$30,101	\$300	\$31,100	\$142,204	20.5	21.7
Denver MSA	\$269,417	\$228,298	\$880	\$34,055	\$532,650	77.0	78.3
Statewide	\$0	\$0	\$0	\$17,000	\$17,000	2.5	0.0

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

Colorado Springs MSA

Lending level reflect good responsiveness to the AA credit needs.

According to the June 30, 2019, FDIC Deposit Market Share Report, UMB had \$330.4 million in deposits in the Colorado Springs MSA. The bank had a 4.0 percent deposit market share. The bank's deposit market share ranked sixth out of 37 deposit-taking institutions. The bank's deposit market share ranking was in the top 16.2 percent in the Colorado Springs MSA.

According to 2018 peer mortgage data, the bank had a 0.2 percent market share of home mortgage originations. The bank's market share of home mortgage originations was weaker than their deposit market share. The bank's market share of home mortgage loan originations ranked 81st out of 542 lenders. The bank ranked in the top 14.9 percent of all home loan originators in the AA. The bank's

market share ranking of home mortgage originations was stronger than their deposit market share ranking.

According to 2018 peer small business data, the bank had a 0.3 percent market share of small business loan originations. The bank's market share of small business loan originations was weaker than their deposit market share. The bank ranked 23rd out of 109 lenders in originating small business loans in the AA. The bank's small business loan originations ranking was in the top 21.1 percent of all lenders in the AA. The bank's market share ranking of small business loan originations was weaker than their deposit market share ranking. The bank had a 2.2 percent market share of small business loan volume. The bank's market share of small business loan volume was weaker than their deposit market share. The bank's volume of small business loan originations was 13th and ranked in the top 11.9 percent of all lender for small business loan volume. The bank's market share ranking of small business loan volume was stronger than their deposit market ranking.

Denver MSA

Lending level reflect good responsiveness to the AA credit needs.

According to June 30, 2018, FDIC Deposit Market Share Report, UMB had \$1.2 billion in deposits in the Denver MSA. UMB's had a 1.4 percent deposit market share in the AA. The bank's market share ranked 13th out of 66 deposit-taking institutions. The bank's deposit market share ranked in the top 19.7 percent in the AA.

According to June 30, 2018, peer mortgage data, UMB had a 0.3 percent of market share of home mortgage originations. The bank's market share of home mortgage originations was weaker than their deposit market share. The bank ranked 73rd out of 791 mortgage loan originators in the AA. The bank's home mortgage loan originations ranked in the top 9.2 percent of all lenders in the AA. The bank's market share ranking of home mortgage loan originations was stronger than their deposit market share ranking.

According to 2018 peer small business data, UMB had a 0.4 percent market share of small business loan originations in the AA. The bank's market share of small business loan originations was weaker than their deposit market share. The bank's market share ranked 21st out of 197 lenders originating small business loans. The bank ranked in the top 10.7 percent of lenders originating small business loans in the AA. The bank's market share ranking was stronger than their deposit market share ranking. The bank had a 2.54 percent market share of small business loan volume. The bank ranked 10th in small business loan volume, which ranks the bank in the top 5.1 percent of all lenders in the AA. The bank's market share and market share ranking for small business loan volume is stronger than their deposit market share and deposit market share ranking.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Table O 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 and purchases.

The geographic distribution of home mortgage loans is adequate.

Colorado Springs MSA

The geographic distribution of home mortgage loans is excellent. Lending in moderate-income geographies carried more weight due to limited lending opportunities in low-income geographies.

The percentage of loans in low-income tracts is near to the aggregate industry distribution of loans and below the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income tracts exceeds both the aggregate industry distribution of loans and demographics.

Denver MSA

The geographic distribution of home mortgage loans is very poor.

The percentage of home mortgage loans in LMI tracts is significantly below both the aggregate industry distribution of loans and the percentage of owner-occupied units in these geographies, respectively.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses is excellent.

Colorado Springs MSA

The geographic distribution of small loans to businesses is excellent. The percentage of loans in LMI geographies exceeded the aggregate industry distribution of loans and the percentage of businesses in these tracts.

Denver MSA

The geographic distribution of small loans to businesses is excellent. The percentage of loans in both LMI geographies exceed both the aggregate industry distribution of loans and the percentage of businesses in these LMI tracts.

Lending Gap Analysis

We reviewed supervisory data and other summary reports. We did not identify any unexplained conspicuous gaps in the bank's lending.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a poor distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

The borrower distribution of home mortgage loans is poor. We gave consideration to the fact that housing in both the Colorado Springs MSA and Denver MSA is not affordable for low-income individuals.

Refer to Table P 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.

Colorado Springs MSA

The borrower distribution of home mortgage loans is good. The percentage of loans to low-income borrowers exceeds the aggregate industry distribution of loans to these borrowers and is below the percentage of low-income families in the AA. The percentage of loans to moderate-income borrowers is near-to both the aggregate industry distribution of loans to these borrowers and the percentage of moderate-income families in the AA.

Denver MSA

The borrower distribution of home mortgage loans is very poor. The percentage of loans to LMI borrowers is significantly below the aggregate industry distribution of loans to these borrowers and the percentage of LMI families in the AA, respectively.

Small Loans to Businesses

Refer to Table R 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 borrower distribution of small loans to business is very poor.

Colorado Springs MSA

The borrower distribution of small loans to businesses is very poor. The percentage of small loans to businesses with gross annual revenues of \$1 million or less is significantly below the aggregate industry distribution of loans to these businesses and the percentage of small businesses in the AA.

Denver MSA

The borrower distribution of small loans to businesses is very poor. The percentage of small loans to businesses with gross annual revenues of \$1 million or less is significantly below the aggregate industry distribution of loans to these businesses and the percentage of small businesses in the AA.

Community Development Lending

The institution is a leader in making CD loans. CD lending had a significantly positive impact on the Lending Test in Colorado.

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

Colorado Springs MSA

UMB's level of CD lending had an excellent level of CD lending that were responsive to identified needs in the AA. During the evaluation period, the bank originated one qualified CD loan totaling \$31.1 million. This volume represented 51.6 percent of allocated tier 1 capital. The loan was for the construction of a 184-unit multi-family housing complex located in a low-income CT situated in a Historically Underutilized Business Zone, as qualified by the Small Business Administration. The loan provided revitalization and stabilization by preventing the growth of blighted areas and also provided affordable housing for LMI individuals.

Denver MSA

UMB's had an excellent level of CD lending in the AA. During the evaluation period, the bank originated nine qualified CD loans, for a total of \$34.1 million. This volume represented 11.6 percent of allocated tier 1 capital. UMB's CD loans demonstrated good responsiveness to AA needs, and concentrated on affordable housing and economic development.

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

- Two loans totaling \$19.6 million to construct two apartment complexes. The complexes help provide affordable housing to LMI individuals. Apartments focus on individuals who are homeless or at risk of being homeless.
- A \$9.3 million 504 SBA loan for the construction of a mid-scale, full-service hotel. The loan provided approximately 43 new LMI jobs at the facility.

Colorado – Statewide

CD lending in the state of Colorado had a neutral impact on the lending performance in the state of Colorado. One loan totaling \$17.0 million for the construction of a multi-family housing unit with affordable rental rates serves the state of Colorado with no purpose, mandate, or function to serve one or more of the bank's AAs in the state.

Product Innovation and Flexibility

The institution makes little use of innovative and/or flexible lending practices in order to serve AA credit needs.

INVESTMENT TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

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

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

The institution exhibits good responsiveness to credit and community economic development needs. The institution makes significant use of innovative and/or complex investments to support CD initiatives.

Qualified Investments and Grants										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Colorado Springs MSA	3	\$1,160	13	\$1,975	16	64.0	\$3,135	21.2	0	\$0
Denver MSA	4	\$2,901	4	\$8,598	8	32.0	\$11,499	77.7	0	\$0
Statewide	0	\$0	1	\$157	1	4.0	\$157	1.1	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.

Colorado Springs MSA

The institution has a significant level of qualified investments, particularly those not provided by private investors. UMB had 16 investments and donations totaling \$3.1 million in the Colorado Springs MSA. Total qualified investments represent 5.2 percent of allocated tier 1 capital for this MSA. The level of qualifying investments demonstrates good performance by the bank to meet CD investment needs of the Colorado Springs MSA. The bank's CD investments focused on affordable housing.

UMB's exhibited good responsiveness to CD needs in the AA. The bank purchased one MBS that aggregated \$1.9 million and provided housing to LMI individuals. In total, UMB made 12 CD donations in the AA directed towards LMI individuals totaling \$65 thousand. UMB made five donations totaling \$26 thousand to organizations that support education and community services to LMI youth. Additionally, UMB made seven donations totaling \$39 thousand to organizations that combat homelessness and provide access to services such as alcohol and drug recovery centers, and free healthcare.

An example of investments made during the evaluation period include:

- A \$1.9 million MBS comprised of eight mortgage loans to LMI borrowers located in the Colorado Springs MSA. This investment provides affordable housing to LMI individuals in the area.

Denver MSA

The institution has a poor level of qualified investments, particularly those that are not provided by private investors. UMB had 8 qualified CD investments and 35 donations totaling \$11.5 million in the Denver MSA. Total qualified investments represent 3.9 percent of allocated tier 1 capital.

The institution exhibits excellent responsiveness to credit and community development needs. In terms of dollar volume, 96.6 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 three MBS that totaled \$6.9 million and provided housing to LMI individuals. An additional investment in Midwest Housing Equity Group (MEHG) for \$1.8 million provided affordable housing to LMI individuals in the AA. UMB also identified youth services, childcare and after school programs as another need in the AA. In total, UMB made 35 CD donations in the AA directed towards LMI individuals totaling \$440 thousand. UMB’s donations included \$378 thousand in donations to various organizations that provide youth services that include childcare, after school programs, medical needs, and nutrition.

Examples of investments made during the evaluation period include:

- A \$1.8 million investment in MHEG Community fund to assist in providing affordable housing to low-income seniors and aid in revitalizing of LMI CTs within Denver.
- Three MBS totaling \$6.4 million comprised of 16 mortgage loans to LMI borrowers located in the Denver MSA. This investment provides affordable housing to LMI individuals.

Investments – Colorado Statewide

When considering the investments made in all AAs in the state, along with the investments in the greater Colorado statewide area, this performance had a neutral impact on the overall Investment Test rating in the state. In addition to the CD investments that benefit the bank’s AAs, UMB made one qualifying investment totaling \$157 thousand during the evaluation period in the broader statewide area. The donation supports access to legal services to LMI individuals. The investment did have a purpose, mandate, or function to serve the bank’s AAs in the state.

SERVICE TEST

The bank’s performance under the Service Test in Colorado is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews the bank’s performance in the Colorado Springs MSA is excellent. Based on a full-scope review the bank’s performance in the Denver MSA is adequate

Retail Banking Services

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Colorado Springs MSA	21.7	4	36.7	25.0	25.0	25.0	25.0	4.7	26.8	39.7	27.4

Denver MSA	78.3	7	63.3	14.3	0.0	57.1	28.6	9.1	25.0	32.2	33.6
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May not add to 100 percent due to N/A census tracts

Colorado Springs MSA

Service delivery systems are readily accessible to geographies and individuals of different income levels in the Colorado Springs MSA. UMB operates four branches and four deposit-taking ATMs in the Colorado Springs MSA. One branch and deposit-taking ATM are in each demographic geography. The percentage of UMB’s branches in low-income geographies significantly exceeds the percentage of population living in these geographies. The percentage of UMB’s branches in moderate-income geographies approximates the percentage of population living in these geographies. The bank has one deposit-taking ATM in LMI geographies in the AA.

Denver MSA

Service delivery systems are reasonably accessible to portions of the Denver MSA, particularly moderate-income geographies and moderate-income individuals. UMB operates seven branches and seven deposit-taking ATMs in the Denver MSA. The percentages of UMB’s branches and ATMs in low-income geographies exceeds the percentage of population living in these geographies. UMB’s does not have any branches or ATMs in moderate-income geographies.

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

Colorado Springs MSA

UMB did not open or close any branches during the evaluation period in this AA.

Bank products and services, including where appropriate, business hours, do not vary in a way that inconveniences, the various portions of its AA, particularly LMI geographies and/or individuals.

Refer to the Scope of Evaluation section for information about alternative delivery systems. We did not place significant weight on these alternative delivery systems, as the bank did not maintain metrics to determine their effectiveness in helping meet the needs of LMI individuals or small businesses.

Denver MSA

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. UMB did not open any branches in the Denver MSA. UMB closed one branch on May 5, 2017 in a middle-income geography in this AA. A bank analysis indicated closure of this branch would enable the bank to achieve operational savings and service their customers in nearby branches.

Bank products and services, including where appropriate, business hours, do not vary in a way that inconveniences, the various portions of its AA, particularly LMI geographies and/or individuals.

Refer to the Scope of Evaluation section for information about alternative delivery systems. We did not place significant weight on these alternative delivery systems, as the bank did not maintain metrics to determine their effectiveness in helping meet the needs of LMI individuals or small businesses.

Community Development Services

The institution provides a relatively high level of CD services.

Colorado Springs MSA

The institution provides an adequate level of CD services in the Colorado Springs MSA. CD services in Colorado Springs MSA include seven individuals participating in 11 activities, performing 159 hours of community service-related activities at eight organizations.

In the Colorado Springs MSA, four employees provided their expertise in non-leadership roles to CD organizations for a total of 25 hours. Three additional bank staff members served either as directors, committee members, or officers to various CD organizations for a total of 134 hours. The following are examples of some of the CD services provided in the AA:

- During the evaluation period, one employee served on the board of an organization that primarily serves LMI households and provides a variety of social service programs for the whole family, including before and after school sites, for a total of 29 hours.
- During the evaluation period, one employee served on the board and three employees assisted in fundraising events for an organization whose mission is to increase the capacity of low-income families and individuals to be self-sufficient, for a total of 20 hours.

Denver MSA

The institution provides a relatively high level of CD services in the Denver MSA. CD services in the Denver MSA include 28 individuals performing 1,103 hours of community service related activities at 19 organizations; four individuals participating in four activities, performing 60 hours of economic development related activities at three organizations; and one individual participating in one activity, performing six hours of revitalization/stabilization related activities at one organization; for a total of 33 individuals performing 1,169 community development volunteer service hours.

In the Denver MSA, 20 employees provided their expertise in non-leadership roles to CD organizations for a total of 117 hours. Additionally, 14 bank staff members served either as directors, committee

members, or officers to various CD organizations for a total of 304 hours. The following are examples of some of the CD services provided in the AA:

- During the evaluation period, one employee served on the board of a non-profit organization serving LMI youth, that raises money for at-risk and disadvantaged youth in Colorado, for a total of 370 hours.
- During the evaluation period, five employees provided financial education, including teaching LMI students about banking, the economy, finance, business management, and teamwork, for a total of 76 hours.

State Rating

State of Kansas

CRA rating for the State of Kansas: 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 levels reflect good responsiveness to AA credit needs.
- The bank had a good geographic distribution of loans and a poor borrower distribution of loans.
- The bank had an adequate level of CD lending, which had a neutral impact on the Lending Test performance in Kansas.
- The bank had an excellent level of CD investments that are responsive to identified community needs. Performance in the limited scope AAs, particularly the Kansas Non-MSA, had a positive impact on the Investment Test rating.
- Delivery systems are reasonably accessible to geographies and individuals of different income levels. The bank provided a relatively high level of CD services.

Description of Institution's Operations in Kansas

UMB has five AAs within the state of Kansas. These AAs include the Kansas non-MSA comprised of Dickinson, Saline, Russell, Bourbon, and Atchison Counties; the Topeka MSA comprised of Shawnee County; the Wichita MSA comprised of Sedgwick County; the Manhattan MSA comprise of Riley County; and the Lawrence MSA comprised of Douglas County. The Manhattan MSA, Topeka MSA,

The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

and Wichita MSA received full-scope reviews. These AAs comply with CRA regulations and do not arbitrarily exclude LMI geographies.

UMB offers a full range of loan and deposit products and services through eight full-service branches within Kansas. Lending is focused on home mortgage and small business loans. The branches represent 8.6 percent of the total branch network. UMB has 10 deposit-taking ATMs in Kansas. As of June 30, 2019, UMB held \$817.3 million in deposits (not including deposits in the Kansas City MMSA also in Kansas), which ranked 11th out of 250 institutions, with a 1.5 percent deposit market share in Kansas AAs. During the evaluation period, Kansas AAs had 4.2 percent of bank-wide deposits. Kansas AAs accounted for 6.3 percent of total loan volume, and 7.6 percent of total loan originations within the bank's AAs.

Manhattan MSA

Strong competition exists within the Manhattan MSA. According to the June 30, 2019, FDIC Deposit Market Share Report, UMB ranked eighth out of 16 depository financial institutions in the AA with a 2.2 percent market share and \$47.4 million in deposits. Competition includes large regional and local community banks. The top five competitors have 83.7 percent of the deposit market share within this AA. The Manhattan MSA has 56 total loans. Total loans equal 6.7 percent of total loan originations in the state.

According to the U.S. Bureau of Labor Statistics, as of December 31, 2019, the unemployment rate in the Manhattan MSA was 2.4 percent, which was lower than the national average of 3.5 percent.

To help identify needs and opportunities in the Manhattan MSA, the OCC utilized one contact from the local government that identified the need for access to start-up funds for small businesses to help with economic development of the market area.

Please refer to the Demographic Information for the Manhattan MSA in Table A below for detailed demographics and other performance context information.

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	14	0.0	14.3	42.9	28.6	14.3
Population by Geography	75,022	0.0	14.5	47.1	34.8	3.6
Housing Units by Geography	29,557	0.0	10.2	52.2	35.9	1.8
Owner-Occupied Units by Geography	11,050	0.0	3.5	48.4	47.5	0.7
Occupied Rental Units by Geography	15,417	0.0	14.5	56.0	26.9	2.6
Vacant Units by Geography	3,090	0.0	12.7	46.6	39.2	1.5
Businesses by Geography	3,139	0.0	20.0	60.9	18.0	1.1
Farms by Geography	169	0.0	4.7	85.8	9.5	0.0
Family Distribution by Income Level	14,170	22.5	18.2	19.2	40.1	0.0
Household Distribution by Income Level	26,467	26.0	18.4	17.2	38.5	0.0
Median Family Income MSA - 31740 Manhattan, KS MSA		\$61,327	Median Housing Value			\$167,723
			Median Gross Rent			\$884

	Families Below Poverty Level	7.0%
<i>Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.</i>		

Topeka MSA

Strong competition exists for financial services within the Topeka MSA. According to the June 30, 2019, FDIC Deposit Market Share Report, UMB ranked fourth out of 21 depository financial institutions in the AA, with a 6.5 percent deposit market share and \$294.9 million in deposits. Competition includes large regional banks, large nationwide banks, and community banks. The top three competitors have 59.2 percent of the deposit market share within this AA. The Topeka MSA has 69 total loans or 8.2 percent of total loan originations in the state.

According to the U.S. Bureau of Labor Statistics, as of December 31, 2019, the unemployment rate in the Topeka MSA was 3.2 percent, which was lower than the national average of 3.5 percent.

To help identify needs and opportunities in the Topeka MSA, the OCC utilized one local contact with a University that mentioned small business credit and access to capital for start-up businesses as needs in the market area.

Please refer to the Demographic Information for the Topeka MSA in Table A below for detailed demographics and other performance context information.

Table A - Demographic Information of the Assessment Area						
Assessment Area: Topeka MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	43	11.6	23.3	39.5	25.6	0.0
Population by Geography	178,792	8.2	18.8	39.7	33.3	0.0
Housing Units by Geography	79,425	9.0	20.6	41.1	29.3	0.0
Owner-Occupied Units by Geography	45,873	4.6	15.3	39.1	41.0	0.0
Occupied Rental Units by Geography	25,495	14.2	26.6	45.9	13.3	0.0
Vacant Units by Geography	8,057	18.0	31.1	37.2	13.7	0.0
Businesses by Geography	9,279	17.0	18.9	39.4	24.8	0.0
Farms by Geography	309	3.6	8.7	26.2	61.5	0.0
Family Distribution by Income Level	44,654	20.8	17.2	21.8	40.3	0.0
Household Distribution by Income Level	71,368	24.0	17.2	18.1	40.7	0.0
Median Family Income MSA - 45820 Topeka, KS MSA		\$64,984	Median Housing Value			\$116,437
			Median Gross Rent			\$752
			Families Below Poverty Level			10.5%
<i>Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Wichita MSA

Strong competition exists within the Wichita MSA. According to the June 30, 2019, FDIC Deposit Market Share Report, UMB ranked 16th of 37 depository financial institutions in the AA, with \$133.4 million in deposits and a 1.0 percent deposit market share. Competition includes large regional banks, community banks, and large banks with a nationwide presence. The top five competitors have a 70.6 percent of the deposit market share within this AA. The Wichita MSA has 188 total loans or 22.4 percent of total loan originations in the state.

According to the U.S. Bureau of Labor Statistics, as of December 31, 2019, the unemployment rate in the Wichita MSA was 3.2 percent, which was lower than the national average of 3.5 percent.

To help identify needs and opportunities in the Wichita MSA, the OCC utilized one local contact with from the local City government. The community contact indicated affordable housing needs in the Wichita MSA, which include the need for investment in housing tax credits, rental assistance, and mortgage lending.

Please refer to the Demographic Information for the Wichita MSA in Table A below for detailed demographics and other performance context information.

Table A - Demographic Information of the Assessment Area						
Assessment Area: Wichita MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	124	12.1	29.0	27.4	31.5	0.0
Population by Geography	506,529	9.3	24.9	28.5	37.2	0.0
Housing Units by Geography	213,700	10.4	26.8	29.4	33.4	0.0
Owner-Occupied Units by Geography	123,624	5.8	19.6	29.0	45.6	0.0
Occupied Rental Units by Geography	69,337	16.1	36.1	31.6	16.2	0.0
Vacant Units by Geography	20,739	18.7	39.2	24.0	18.1	0.0
Businesses by Geography	26,038	7.3	27.6	31.4	33.7	0.0
Farms by Geography	843	3.3	14.6	25.9	56.2	0.0
Family Distribution by Income Level	124,645	21.7	17.7	20.9	39.8	0.0
Household Distribution by Income Level	192,961	24.3	16.8	18.3	40.6	0.0
Median Family Income MSA - 48620 Wichita, KS MSA		\$64,331	Median Housing Value			\$123,957
			Median Gross Rent			\$745
			Families Below Poverty Level			11.0%

Source: 2015 ACS Census and 2018 D&B Data
 Due to rounding, totals may not equal 100.0
 (*) The NA category consists of geographies that have not been assigned an income classification.

Scope of Evaluation in Kansas

For the state of Kansas, we completed full-scope reviews for the Topeka MSA, Wichita MSA, and the Manhattan MSA. We conducted limited-scope reviews for the Lawrence MSA and the Kansas Non-MSA. UMB’s performance in the Topeka and Wichita MSAs is weighted equally in arriving at the overall conclusion for the state as they provide the largest share of loans and deposits amongst the full-

scope AAs. Within the Topeka MSA, home mortgage and small business loans originations made up 46.4 and 52.2 percent of loans, respectively. Within the Wichita MSA home mortgage and small business loan originations made up 20.2 percent and 79.8 percent of loans, respectively. Within the Manhattan MSA home mortgage and small business loan originations made up 52.3 percent and 47.7 percent of loan, respectively. For the Lending Test in the Wichita MSA we gave more weight to CRA small business loans performance, due to the larger percentage of lending by both number of loan originations and dollar volume of lending. Sate ratings in Kansas are based primarily on the results of the areas that received full-scope reviews.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS

LENDING TEST

The bank's performance under the Lending Test in Kansas is rated Low Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Manhattan MSA is excellent. Based on full-scope reviews the bank's performance in the Topeka MSA and Wichita MSA is adequate.

Lending Activity

Lending levels reflect good responsiveness to credit needs in the state of Kansas.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Kansas Non-MSA	162	101	197	0	460	54.6	36.5
Lawrence MSA	28	37	0	1	66	7.8	5.3
Manhattan MSA	23	21	12	0	56	6.6	5.8
Topeka MSA	32	36	1	0	69	8.2	36.1
Wichita MSA	37	146	5	4	192	22.8	16.3

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

Dollar Volume of Loans* (000's)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Kansas Non-MSA	\$12,597	\$23,117	\$37,447	\$0	\$73,161	40.7	36.5
Lawrence MSA	\$3,990	\$12,507	\$0	\$1,780	\$18,277	10.2	5.3
Manhattan MSA	\$6,615	\$2,553	\$1,985	\$0	\$11,153	6.2	5.8
Topeka MSA	\$2,385	\$12,108	\$200	\$0	\$14,693	8.2	36.1
Wichita MSA	\$8,317	\$47,174	\$1,352	\$5,546	\$62,389	34.7	16.3

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

Manhattan MSA

Lending levels reflect good responsiveness to the credit needs of the AA.

According to June 30, 2019, FDIC Deposit Market Share Report, UMB had \$47.4 million in deposits in the Manhattan MSA. The bank had a 2.2 percent deposit market share in the AA. The bank deposit market share ranked eighth out of 16 deposit-taking institutions in the AA. The deposit market share ranking was in the top 50.0 percent in the AA.

According to 2018 peer mortgage data, UMB had a 0.4 percent market share of home mortgage loan originations. The bank's market share of home mortgage loan originations was weaker than their deposit market share. The bank's home mortgage loan origination market share ranked 44th out of 150 lenders. The bank's market share of home mortgage loan originations ranked in the top 29.3 percent of all lenders in the AA. The bank's market share ranking of home mortgage loan originations was stronger than their deposit market share ranking.

According to 2019 peer small business data, UMB had a 1.0 percent market share of small business loan originations. The bank's market share of small business loan originations was weaker than their deposit market share. The bank's market share of small business loan originations ranked 19th out of 37 lenders originating small business loans in the AA. The bank's market share of small business loan originations was in the top 51.4 percent of small business lenders in the AA. The bank's market share ranking of small business loan origination was near to the bank's deposit market share ranking. The bank had a 2.3 percent market share of small business loan origination volume. The bank's market share of volume of small business loans was stronger than their deposit market share. The bank's market share of small business loan volume ranked 10th out of 37 small business lenders in the AA. The bank's small business loan volume ranking was in the top 27.0 percent of lenders in the AA. The bank's market share ranking of small business loan volume was stronger than their deposit market share ranking.

Topeka MSA

Lending levels reflect adequate responsiveness to the credit needs of the AA.

According to the June 30, 2019, FDIC Deposit Market Share Report, UMB had \$294.9 million in deposits in the Topeka MSA. The bank had a 6.5 percent deposit market share in the AA. The bank has a deposit market share ranked fourth out of 21 deposit-taking institutions in the AA. The bank's deposit market share ranked in the top 19.1 percent.

According to 2018 peer mortgage data, the bank had a 0.3 percent market share of home mortgage originations. The bank's market share of home mortgage loan originations was well below their deposit market share. The bank ranked 47th out of 211 and lenders origination home mortgage loans in the AA. The bank ranked in the top 22.3 percent of lenders for home mortgage loan originations. The bank's market share ranking of home mortgage loans was somewhat near to their deposit market share.

According to 2018 peer small business data, the bank had a 0.6 percent market share of small business loan originations. The bank's market share of small business loan originations was well below their deposit market share. The bank ranked 18th out of 61 lenders originating small business loans in the AA. The bank ranked in the top 29.5 percent of lenders originating small business loans. The bank's ranking of small business loans originations was below their deposit market share ranking. The bank had a 6.5 percent market share of volume of small business loans. The market share of volume of small business

loans approximates their deposit market share. The bank's volume of small business loans ranked second out of 61 lenders originating small business loans in the AA. The bank's ranking for small business loan volume was in the top 3.2 percent of all lenders. The bank's ranking for small business loan volume was stronger than their deposit market share ranking.

Wichita MSA

Lending levels reflect good responsiveness to the credit needs of the AA.

According to June 30, 2019, FDIC Deposit Market Share Report, UMB had a \$133.5 in deposit in the Wichita MSA. The bank had a 1.0 percent deposit market share in the AA. The bank's deposit market share ranked 16th out of 37 deposit-taking institutions in the AA. The bank's deposit market share ranked in the top 43.2 percent.

According to 2018 peer mortgage data, UMB had a 0.1 percent market share of home mortgage originations. The bank's market share of home mortgage originations was well below their deposit market share. The bank ranked 120th out of 306 lenders originating home mortgage loans in the AA. The bank ranked in the top 39.2 percent of all lenders originating home mortgage loans. The bank's home mortgage origination market share ranking was stronger than their deposit market share ranking.

According to 2018 peer small business data, UMB had a 0.6 percent market share of small business loan originations. The bank's market share of small business loan originations was weaker than their deposit market share. The bank ranked 26th out of 92 lenders originating small business loans in the AA. The bank ranked in the top 28.3 percent for small business loan originations. The bank's small business loan origination ranking was stronger than their deposit market share ranking. The bank had a 3.5 percent market share of small business loan volume in the AA. The bank's market share of small business loan volume was stronger than their deposit market share. UMB ranked ninth out of 92 for volume of small business loans in the AA. The bank's volume of small business lending ranked in the top 9.8 percent. The bank's small business loan volume ranking was stronger than their deposit market share ranking.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Table O 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 and purchases.

The geographic distribution of home mortgage loans is adequate.

Manhattan MSA

The geographic distribution of home mortgage loans is excellent. We gave consideration to the fact that rental and vacant units in moderate-income tracts are 74.2 percent and 13.0 percent, respectively. There are no low-income geographies in this AA.

The percentage of loans in moderate-income tracts is near to the aggregate industry distribution of loans and exceeds the percentage of owner-occupied units in these geographies.

Topeka MSA

The geographic distribution of home mortgage loans is adequate. The percentage of loans in low-income tracts exceeds the aggregate industry distribution of loans and is below the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income tracts is significantly below both the aggregate industry distribution of loans and the percentage of owner-occupied units.

Wichita MSA

The geographic distribution of home mortgage loans is poor. The percentage of loans in LMI tracts is significantly below both the aggregate industry distribution of loans and the percentage of owner-occupied units in LMI geographies, respectively.

Small Loans to Businesses

Refer to Table Q in the state of Kansas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is good.

Manhattan MSA

The geographic distribution of small loans to businesses is excellent. There are no low-income geographies in this AA. The percentage of loans in moderate-income geographies exceeds the aggregate industry distribution of loans and the percentage of businesses in moderate-income tracts.

Topeka MSA

The geographic distribution of small loans to businesses is excellent. The percentage of loans in LMI geographies exceed the aggregate industry distribution of loans and approximates the percentage of businesses in LMI geographies.

Wichita MSA

The geographic distribution of small loans to businesses is good. The percentage of loans in low-income geographies is below both the aggregate industry distribution of loans and the percentage of businesses in these geographies. The percentage of loans in moderate-income geographies exceeds the aggregate industry distribution of loans and is near to demographics.

Lending Gap Analysis

We reviewed supervisory data and other summary reports. We did not identify any conspicuous gaps in the bank's lending.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a poor distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table P 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 borrower distribution of home mortgage loans is adequate.

Manhattan MSA

The borrower distribution of home mortgage loans is excellent. We gave consideration to the fact housing is not affordable for low-income individuals.

The percentage of loans to low-income borrowers exceeds the aggregate industry distribution of loans to these borrowers and is near to the percentage of low-income families in the AA. The percentage of loans to moderate-income borrowers exceeds the aggregate industry distribution of loans to these borrowers and is near to demographics.

Topeka MSA

The borrower distribution of home mortgage loans is adequate. The percentage of loans to low-income borrowers is significantly below both the aggregate industry distribution of loans to these borrowers and the percentage of low-income families in the AA. The percentage of loans to moderate-income borrowers exceeds both the aggregate industry distribution of loans to these borrowers and demographics.

Wichita MSA

The borrower distribution of home mortgage loans is poor. The percentage of loans to low-income borrowers is below the aggregate industry distribution of loans to these borrowers and significantly below the percentage of low-income families in the AA. The percentage of loans to moderate-income borrowers is significantly below both the aggregate industry distribution of loans to these borrowers and demographics.

Small Loans to Businesses

Refer to Table R 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 borrower distribution of small loans to businesses is poor.

Manhattan MSA

The borrower distribution of small loans to businesses is adequate. The percentage of small loans to businesses with gross annual revenues of \$1 million or less exceeds the aggregate distribution of loans to these businesses and is significantly below the percentage of small businesses in the AA.

Topeka MSA

The borrower distribution of small loans to businesses is poor. The percentage of small loans to businesses with gross annual revenues of \$1 million or less is significantly below both the aggregate distribution of loans to these businesses and the percentage of small businesses in the AA.

Wichita MSA

The borrower distribution of small loans to businesses is poor. The percentage of small loans to businesses with gross annual revenues of \$1 million or less is significantly below both the aggregate distribution of loans to these businesses and the percentage of small businesses in the AA.

Community Development Lending

The institution made an adequate level of CD loans in the state of Kansas. CD lending in Kansas had a neutral impact on the bank's Lending Test performance.

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

Manhattan MSA

During the evaluation period, the institution did not originate any qualified CD loans in the Manhattan MSA.

Topeka MSA

During the evaluation period, the institution did not originate any qualified CD loans in the Topeka MSA.

Wichita MSA

CD loans demonstrated excellent responsiveness to AA credit needs. UMB originated two qualified CD loans \$5.5 million. This volume represented 18.4 percent of allocated tier 1 capital. The CD loans focused on economic development for a start-up business and community services for LMI individuals.

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

- A \$4.5 million loan for a start-up business for mining sand on approximately 155 acres. The business will provide five new full-time LMI salaried positions.
- A \$1.1 million renewal loan for a daycare center for children participating in the Federal Head Start Program. The federal program promotes school readiness of children from low-income families by enhancing cognitive, social, and emotion development skills. The facility is located in a moderate-income tract.

Product Innovation and Flexibility

The institution makes little use of innovative and/or flexible lending practices in order to serve AA credit needs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Kansas Non-MSA is stronger than the bank's overall performance under the Lending Test in the full-scope areas. Stronger performance in the Kansas Non-MSA is due to good borrower distribution of home mortgage loans and good borrower distribution of small loans to farms. Performance in the Lawrence MSA is consistent with the overall Lending Test rating. Performance in the limited-scope reviews had a neutral impact on the overall Lending Test rating.

INVESTMENT TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Topeka is excellent. The bank's performance in the Wichita MSA is good. The bank's performance in the Manhattan MSA is adequate.

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

The institution exhibits an overall good responsiveness to credit and community economic development needs. The institution occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified Investments and Grants										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Kansas Non-MSA	3	\$1,471	20	\$2,072	23	33.8	\$3,543	34.0	0	0
Lawrence MSA	1	\$1,000	2	\$10	3	4.4	\$1,010	9.7	0	0
Manhattan MSA	1	\$323	7	\$9	8	11.8	\$332	3.2	0	0
Topeka MSA	0	\$0	21	\$3,809	21	30.9	\$3,809	36.5	0	0
Wichita MSA	2	\$146	11	\$1,585	13	19.1	\$1,731	16.6	0	0

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

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

Manhattan MSA

The institution exhibits an adequate level of qualified investments, particularly those not provided by private investors, although rarely in a leadership position UMB had eight investments and grants totaling approximately \$332 thousand. Total CD investments and grants were equivalent to 4.7 percent of

allocated tier 1 capital. This includes one prior period investment and seven grants. The bank did not make any current period CD investments. The institution exhibits poor responsiveness to credit and CD needs. The bank makes rare use of innovative or complex CD investments. The bank's prior period CD investment benefitted affordable housing.

Topeka MSA

The institution has an excellent level of CD investments, particularly those not provided by private investors, often in a leadership position. UMB had 21 investments and grants totaling approximately \$3.8 million. This includes 12 current period investments totaling \$3.8 million. Additionally, UMB made nine grants totaling \$52 thousand, for a total of approximately \$3.8 million. CD investments and grants were equivalent to 18.7 percent of allocated tier 1 capital.

The institution exhibits good responsiveness to credit and community needs. UMB makes occasional use of innovative or complex investments. The bank's qualified investments in the AA included an MBS for \$743 thousand, which consisted of nine mortgage loans that were extended to LMI borrowers. Additionally, UMB provided a grant for \$15 thousand to an organization that provides funding to small businesses to help create opportunities for growth, prosperity, innovation, and economic diversity within the AA. The focus of the organization is to grow the community by helping local businesses create jobs and increase production. Some of the requirements to qualify for a loan through the organization is for the business to be owned by a low-income person, to be located in an economically distressed area, and to employ low-income individuals.

Wichita MSA

The institution has a significant level of qualified investments, particularly those not provided by private investors, occasionally in a leadership position. UMB had 13 investments and grants totaling approximately \$1.7 million. This includes two prior period investments totaling \$146 thousand and three current period investment equaling \$1.5 million. Additionally, the bank made nine grants totaling \$55 thousand. Total CD investments and grants total \$1.7 million. CD investments and grants were equivalent to 5.8 percent of allocated tier 1 capital.

The institution exhibits good responsiveness to credit and CD needs. UMB makes significant use of innovative or complex investments. The bank's qualified investments in the AA included a LIHTC bond for a total of \$3 million, of which \$900 thousand was designated for use in the Wichita MSA. This portion of the bond supported three different affordable housing communities with a total of 120-units. Additionally, UMB provided a grant for \$25 thousand to an organization that builds quality affordable housing through new construction and rehabilitation for low-income families.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Kansas Non-MSA and Lawrence MSA is consistent with the overall Investment Test rating. Excellent performance in limited-scope reviews is based on a high level of CD investments as compared to allocated tier 1 capital. Performance in the limited-scope AAs had a positive impact on the overall Investment Test rating.

SERVICE TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the full-scope areas in the Manhattan MSA is excellent. The bank performance in the Wichita MSA is good. The bank's performance in the Topeka MSA is poor.

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Kansas Non-MSA	36.5	5	50.0	0.0	40.0	40.0	20.0	0.0	21.5	53.7	24.8
Lawrence MSA	5.3	1	10.0	0.0	0.0	0.0	100.0	10.2	29.2	31.9	28.7
Manhattan MSA	5.8	1	10.0	0.0	100.0	0.0	0.0	0.0	14.5	47.1	34.8
Topeka MSA	36.1	1	10.0	0.0	0.0	100.0	0.0	8.2	18.8	39.7	33.3
Wichita MSA	16.3	2	20.0	0.0	50.0	0.0	50.0	9.3	24.9	28.5	37.2

Manhattan MSA

Service delivery systems are readily accessible to geographies and individuals of different income levels. UMB operates one branch and one deposit-taking ATM in the Manhattan MSA, both are in a moderate-income geography. With only one branch for this AA, the percentage of UMB's branches in a moderate-income geography significantly exceeds the percentage of population living in this geography. This AA does not have low-income CTs.

Topeka MSA

Service delivery systems are reasonably accessible to portions of the AA, particularly LMI geographies and individuals. UMB operates one branch and one deposit-taking ATM in the Topeka MSA AA; both are in a middle-income geography. There are no branches or deposit-taking ATMs in LMI geographies.

Wichita MSA

Service delivery systems are readily accessible to geographies and individuals of different income levels. UMB operates two branches and two deposit-taking ATMs in the Wichita MSA AA. The bank has one branch and one deposit-taking ATM in a moderate-income geography and one branch and deposit-taking ATM in an upper-income geography. The percentages of UMB’s branches in moderate-income geographies significantly exceeds the percentage of population living in these geographies. UMB does not have branches or deposit-taking ATMs in low-income geographies.

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

Manhattan MSA

The bank did not open or close any branches, in LMI CTs, in the Manhattan MSA throughout the evaluation period. The bank did close one branch in a middle-income CT. A bank analysis indicated closure of this branch would enable the bank to achieve operational savings and service their customers in nearby branches.

Services, including where appropriate, business hours do not vary in a way the inconveniences the various portions if it’s AA, particularly LMI geographies and individuals. Services offered, and hours of operations are comparable among locations, regardless of the income level of the CT the branch resides.

Refer to the Scope of Evaluation section for information about alternative delivery systems. We did not place significant weight on these alternative delivery systems, as the bank did not maintain metrics to determine their effectiveness in helping meet the needs of LMI individuals or small businesses.

Topeka MSA

To the extent changes have been made, the bank’s record of opening and closing branches has adversely affected the accessibility of its delivery systems, particularly to in moderate-income geographies. The bank closed its only LMI branch in the AA during the evaluation. A bank analysis indicated closure of the branch would enable the bank to achieve operational savings and service their customers in nearby branches.

Services, including where appropriate, business hours do not vary in a way the inconveniences the various portions if it's AA, particularly LMI geographies and individuals. Services offered, and hours of operations are comparable among locations, regardless of the income level of the CT the branch resides.

Refer to the Scope of Evaluation section for information about alternative delivery systems. We did not place significant weight on these alternative delivery systems, as the bank did not maintain metrics to determine their effectiveness in helping meet the needs of LMI individuals or small businesses.

Wichita MSA

The bank did not open or close any branches, in the Wichita MSA, throughout the evaluation period.

Services, including where appropriate, business hours do not vary in a way the inconveniences the various portions if it's AA, particularly LMI geographies and individuals. Services offered, and hours of operations are comparable among locations, regardless of the income level of the CT the branch resides.

Refer to the Scope of Evaluation section for information about alternative delivery systems. We did not place significant weight on these alternative delivery systems, as the bank did not maintain metrics to determine their effectiveness in helping meet the needs of LMI individuals or small businesses.

Community Development Services

The institution provides a relatively high level of CD services.

Manhattan MSA

The bank is a leader in providing CD services. CD services in the Manhattan MSA include one individual participating in four activities, performing 317 hours of community service-related activities at two organizations. The employee provided their expertise in non-leadership roles for a total of 302 hours and served as a board member and fundraiser for an additional 15 hours. The following is an example of the CD services provided in the AA:

- During the evaluation period, one employee provided financial education by teaching foster children how to develop a budget and how to balance a checkbook at an organization that serves teens who find themselves in the state foster care system for a total of 302 hours.

Topeka MSA

The bank provides an adequate level of CD services. CD services in the Topeka MSA include one individual performing 216 hours of economic development related activities at one organization and 72 hours of community service-related activities at another organization; and one individual participating in two activities, performing 30 hours of community service-related activities at one organization; for a total of two individuals participating in three activities, performing 318 community development volunteer service hours. The following is an example of the CD services provided in the AA:

- During the evaluation period, one employee served on the board of directors at a non-profit organization whose mission is to grow the community by helping local businesses create jobs

and increase production in Topeka and Shawnee County for a total of 216 hours.
 Qualifications to be a beneficiary of the fund is that the business owner must be LMI.

Wichita MSA

The bank provides an adequate level of CD services. CD services in the Wichita MSA include four individuals participating in 12 activities, performing 202 hours of community service-related activities at five organizations; and one of the four individuals participating in two activities, performing 46 hours of affordable housing related activities at one organization; for a total of four individuals participating in 14 instances performing 248 community development volunteer service hours.

In the Wichita MSA, four employees served either as directors, committee members, or officers to various CD organizations for a total of 248 hours. The following are examples of some of the CD services provided in the AA:

- During the evaluation period, two employees served on the board of directors at a non-profit organization that offers emergency, temporary, and residential care for children who come from low-income families in the community for a total of 125 hours.
- During the evaluation period, one employee served on the board of directors for an organization that offers assistance to LMI people needing affordable housing, for a total of 46 hours.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s performance under the Service Test in the Kansas Non-MSA is stronger than the bank’s overall performance under the Service Test in the full-scope areas. Stronger performance is due to an excellent branch distribution. The bank’s performance in the Lawrence MSA is weaker than the bank’s overall performance in the Service Test. Weaker performance is due to a poor branch distribution. Performance in Limited-Scope AA’s had a neutral impact on the Service Test rating.

State Rating

State of Missouri

CRA rating for the State of Missouri: 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 statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

- Lending levels reflect adequate responsiveness to the AAs credit needs.
- The bank exhibits excellent geographical distribution of loans and adequate borrower distribution of loans.
- The bank has made an adequate level of CD loans that are responsive to identified community needs. CD lending had a neutral impact on the Lending Test.
- The bank's performance in limited-scope AAs, particularly the Missouri Non-MSA, had a positive impact on the overall Lending Test rating. Geographical and borrower distribution of farm loans was excellent. Lending to farms in the Missouri Non-MSA constitutes a significant portion of lending in the state of Missouri.
- The bank had an excellent level of qualified CD investment and grants. CD investments were responsive to identified community needs.
- Delivery systems are reasonably accessible to geographies and individuals of different income levels in the AAs.

Description of Institution's Operations in Missouri

UMB has six AAs within the state of Missouri. These AAs include the Columbia MSA comprised of Boone and Cooper Counties; the Jefferson City MSA comprised of Cole County; the Joplin MSA comprised of Jasper and Newton Counties; the Missouri Non-MSA comprised of Benton, Henry, Pettis, Johnson, Linn, Sullivan, Barry, and Lawrence Counties; the Springfield MSA comprised of Christian and Greene Counties; and the St. Joseph MSA comprised of Buchanan County. The Joplin MSA, Springfield MSA, and St. Joseph MSA received full-scope reviews. These AAs comply with CRA regulations and do not arbitrarily exclude LMI geographies.

UMB offers a full range of loan and deposit products and services through 15 full-service branches within Missouri. Lending is focused on home mortgage, small business loans, and small farm loans. The branches represent 16.1 percent of the total branch network. UMB has 17 deposit-taking ATMs in Missouri. As of June 30, 2019, UMB held \$865.5 million in statewide deposits (not including deposits in Missouri counties in the Kansas City MMSA or the St. Louis MMSA) and ranked 16th in the state out of 242 deposit-taking institutions with a 1.4 percent market share. During the evaluation period, 4.4 percent of bank deposits and 10.1 percent of loans were from Missouri AAs.

Joplin MSA

Strong competition exists for financial services within the Joplin MSA. According to the June 30, 2019, FDIC Deposit Market Share Report, UMB ranked eighth of 14 depository financial institutions in the AA, with a 5.5 percent market share and \$156.4 million in deposits. Competition includes large regional banks, large nationwide institutions, and community banks. The top five competitors have 63.7 percent of the deposit market share within this AA. The Joplin MSA accounts for 0.8 percent of total bank deposits. Within Missouri AAs, the Joplin MSA has 72 total loans, which account for 6.4 percent of total loans originations and 4.0 percent of the loan volume in the state.

According to the U.S. Bureau of Labor Statistics, as of December 31, 2019, the unemployment rate in the Joplin, MO MSA was 3.2 percent, which was lower than the national average of 3.5 percent.

To help identify needs and opportunities in the Joplin MSA, the OCC utilized one contact with an economic development organization. The community contact identified workforce development for both skilled and unskilled workers and affordable housing. UMB conducted its research and also identified affordable housing, financial education, micro lending for small businesses, and healthcare services as community needs in the AA.

Please refer to the Demographic Information for the Joplin MSA in Table A below for detailed demographics and other performance context information.

Table A - Demographic Information of the Assessment Area						
Assessment Area: Joplin MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	34	0.0	17.6	67.6	14.7	0.0
Population by Geography	175,961	0.0	14.4	69.1	16.5	0.0
Housing Units by Geography	75,448	0.0	16.4	67.8	15.9	0.0
Owner-Occupied Units by Geography	45,044	0.0	10.7	71.0	18.3	0.0
Occupied Rental Units by Geography	22,571	0.0	24.2	62.8	12.9	0.0
Vacant Units by Geography	7,833	0.0	26.0	63.6	10.4	0.0
Businesses by Geography	9,392	0.0	19.0	67.6	13.4	0.0
Farms by Geography	438	0.0	6.2	86.1	7.8	0.0
Family Distribution by Income Level	45,479	19.9	18.3	21.2	40.6	0.0
Household Distribution by Income Level	67,615	22.1	17.3	18.8	41.8	0.0
Median Family Income MSA - 27900 Joplin, MO MSA		\$51,752	Median Housing Value			\$108,187
			Median Gross Rent			\$689
			Families Below Poverty Level			11.5%

*Source: 2015 ACS Census and 2018 D&B Data
Due to rounding, totals may not equal 100.0
(* The NA category consists of geographies that have not been assigned an income classification.*

Springfield MSA

The banking industry is highly competitive within the Springfield MSA. According to the June 30, 2019, FDIC Deposit Market Share Report, UMB ranked 17th out of 33 depository financial institutions in the AA, with a 1.5 percent market share and \$146.7 million in deposits. Competition includes large regional banks, community banks, and large banks with a nationwide presence. The top five competitors have 53.9 percent of the deposit market share within this AA. The Springfield MSA has 225 total loan originations. Within Missouri AAs, loan originations and loan volume in the Springfield MSA total 20.1 percent and 38.5 percent, respectively.

According to the U.S. Bureau of Labor Statistics, as of December 31, 2019, the unemployment rate in the Springfield MSA was 3.0 percent, which was lower than the national average of 3.5 percent.

To help identify needs and opportunities in the Springfield MSA, the OCC utilized a regulatory agency contact with an organization that provides homeless housing and homeless prevention services and an access point for affordable housing and services. The community contact indicated that primary needs are investments and donations to organizations providing LMI community services and affordable home improvement loans.

Please refer to the Demographic Information for the Springfield MSA in Table A below for detailed demographics and other performance context information.

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	76	6.6	25.0	50.0	17.1	1.3
Population by Geography	364,110	4.7	19.7	54.8	19.6	1.2
Housing Units by Geography	160,506	5.4	21.5	53.6	19.1	0.5
Owner-Occupied Units by Geography	90,741	2.7	12.8	58.7	25.7	0.0
Occupied Rental Units by Geography	56,880	9.0	33.3	46.7	9.9	1.1
Vacant Units by Geography	12,885	8.2	30.2	47.3	13.2	1.0
Businesses by Geography	22,734	2.7	26.2	52.2	18.5	0.5
Farms by Geography	817	2.0	12.0	65.2	20.7	0.1
Family Distribution by Income Level	92,418	19.6	18.3	20.9	41.3	0.0
Household Distribution by Income Level	147,621	22.0	17.5	18.0	42.6	0.0
Median Family Income MSA - 44180 Springfield, MO MSA		\$54,948	Median Housing Value			\$132,465
			Median Gross Rent			\$712
			Families Below Poverty Level			11.7%

*Source: 2015 ACS Census and 2018 D&B Data
Due to rounding, totals may not equal 100.0
(* The NA category consists of geographies that have not been assigned an income classification.*

St. Joseph MSA

According to the June 30, 2019, FDIC Deposit Market Share Report, UMB ranked fifth of 14 depository financial institutions in the AA with an 8.0 percent deposit market share and \$134.4 million in deposits. Competition includes large regional banks, community banks, and large institutions with a nationwide presence. The top four competitors have 68.0 percent of the deposit market share within this AA. The St. Joseph MSA has 116 total loans. Within Missouri AAs, the St. Joseph MSA has 10.4 percent and 8.9 percent of statewide loan originations and loan volume, respectively.

According to the U.S. Bureau of Labor Statistics, as of December 31, 2019, the unemployment rate in the St. Joseph MSA was 3.1 percent, which was lower than the national average of 3.5 percent.

To help identify needs and opportunities in the St. Joseph MSA, the OCC utilized one regulatory agency contacts with an organization that provides community resources. The community contact indicated that primary needs are financial literacy in the schools, small business loans, and affordable housing. The contact reported that there is enough involvement with the banks in the area.

Please refer to the Demographic Information for the St. Joseph MSA in Table A below for detailed demographics and other performance context information.

Table A - Demographic Information of the Assessment Area						
Assessment Area: St Joseph MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	25	4.0	28.0	48.0	20.0	0.0
Population by Geography	89,561	2.0	26.7	45.8	25.5	0.0
Housing Units by Geography	38,487	2.8	28.3	47.5	21.3	0.0
Owner-Occupied Units by Geography	21,091	0.9	22.8	48.9	27.4	0.0
Occupied Rental Units by Geography	12,085	5.3	30.6	48.2	15.9	0.0
Vacant Units by Geography	5,311	4.7	45.2	40.6	9.5	0.0
Businesses by Geography	4,386	7.3	18.7	42.4	31.6	0.0
Farms by Geography	178	0.6	6.2	64.6	28.7	0.0
Family Distribution by Income Level	20,874	22.3	17.2	24.0	36.4	0.0
Household Distribution by Income Level	33,176	25.9	16.0	17.4	40.6	0.0
Median Family Income MSA - 41140 St. Joseph, MO-KS MSA		\$59,820	Median Housing Value			\$115,283
			Median Gross Rent			\$702
			Families Below Poverty Level			13.9%
<i>Source: 2015 ACS Census and 2018 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Missouri

For the state of Missouri, we completed full-scope reviews for the Joplin MSA, Springfield MSA, and the St. Joseph MSA. We conducted limited-scope reviews for the Columbia MSA, Jefferson City MSA, and the Missouri Non-MSA. UMB’s performance in the Springfield MSA is weighted most heavily in arriving at the overall conclusion for the state, as it provides the largest share of loans and deposits amongst the full-scope AAs. Of the HMDA and CRA small business loans that were originated in Missouri throughout the evaluation period, 20.3 percent of loans were originated or purchased in the Springfield MSA, 10.4 percent were in the St. Joseph MSA, and 6.1 percent were in the Joplin MSA. For the Lending Test we gave equal weight to HMDA and CRA small business loans. The Missouri state ratings are based primarily on the results of the areas that received full-scope reviews.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MISSOURI

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Joplin MSA is good. Based on full-scope reviews the bank's performance in the Springfield MSA and St. Joseph MSA is adequate.

Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Columbia MSA	71	58	26	1	156	13.9	10.5
Jefferson City MSA	17	37	0	0	54	4.8	5.3
Joplin MSA	37	27	4	4	72	6.4	18.1
Missouri Non-MSA	211	79	204	0	494	44.1	33.7
Springfield MSA	126	99	0	0	225	20.1	16.9
St. Joseph	85	30	0	1	116	10.3	15.5
Statewide	0	0	0	4	4	0.4	0.0

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

Dollar Volume of Loans* (000's)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Columbia MSA	\$24,351	\$11,537	\$3,912	\$107	\$39,907	13.6	10.5
Jefferson City MSA	\$1,419	\$15,205	\$0	\$0	\$16,624	5.6	5.3
Joplin MSA	\$3,260	\$5,732	\$115	\$2,588	\$11,695	4.0	18.1
Missouri Non-MSA	\$18,098	\$26,543	\$38,966	\$0	\$83,607	28.4	33.7
Springfield MSA	\$81,850	\$29,338	\$0	\$0	\$111,188	37.8	16.9
St. Joseph MSA	\$11,142	\$9,405	\$0	\$5,200	\$25,747	8.7	15.5
Statewide	\$0	\$0	\$0	\$5,600	\$5,600	1.9	0.0

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

Joplin MSA

Lending levels reflect adequate responsiveness to AA credit needs.

According to June 30, 2019, FDIC Deposit Market Share Report, UMB had \$156.4 million in deposits in the Joplin MSA. The bank had a 5.5 percent deposit market share in the Joplin MSA. The bank's deposit market share ranked eighth out of 14 deposit-taking institutions in the AA. The bank deposit market share ranking was in the top 57.1 percent.

According to 2018 peer mortgage data, UMB had a 0.3 percent market share of home mortgage originations. The bank's market share of home mortgage originations was well below their deposit market share. The bank home mortgage loan origination market share ranked 50th out of 209 lenders in the AA. The bank's home mortgage loan origination market share ranking was in the top 23.9 percent. The bank's home mortgage loan origination market share ranking was stronger than their deposit market share ranking.

According to 2018 peer small business data, UMB had a 0.4 percent market share of small business loan originations in the Joplin MSA. The bank's market share of small business loan originations was well below their deposit market share. The bank's market share of small business loan originations ranked 26th out of 72 lenders in the AA. The bank's market share of small business loan originations ranked in the top 36.1 percent. The bank's market share of small business loan originations was stronger than their deposit market share. The bank's market share of small business loan volume was 2.08 percent. The bank's market share of small business loan volume was well below their deposit market share. The bank's volume of small business loan market share ranked ninth out of 72 lenders. The bank's volume of small business loan market share ranked in the top 12.5 percent of lenders. The bank's volume of small business loan market share ranking was stronger than their deposit market share ranking.

Springfield MSA

Lending levels reflect adequate responsiveness to AA credit needs.

According to the June 30, 2019, FDIC Deposit Market Share Report, UMB had \$146.7 million in deposits in the Springfield MSA. The bank had a 1.5 percent deposit market share in the Springfield MSA. The bank's deposit market share ranked 17th out of 33 deposit-taking institutions in the AA. The bank's deposit market share was in the top 51.5 percent in the AA.

According to 2018 peer mortgage data, UMB had 0.4 percent market share of home mortgage loan originations in the Springfield MSA. The bank's market share of home mortgage loan originations is well below the bank's deposit market share. The bank home mortgage loan market share ranked 57th out of 300 lenders. The bank's home mortgage loan market share ranked in the top 19.0 percent in the AA. The bank's home mortgage loan market share ranking was stronger than their deposit market share ranking.

According to 2018 peer small business data, the bank had a 0.3 percent market share of small business loan originations. The bank's market share of small business loan originations was well below the bank's deposit market share. The bank's market share of small business loan originations ranked 11th out of 173 small business lenders in the AA. The bank's market share of small business loan originations ranked in the top 6.4 percent in the AA. The bank's market share of small business loan originations was stronger than their deposit market share. The bank had a 1.2 percent market share of small business loan volume. The bank's market share of small business loan volume is weaker than their deposit market share. The bank's market share of small business loan volume ranked 19th out of 173 small business lenders. The bank's market share ranking of small business loan volume was in the top 11.0 percent in the AA. The bank's market share ranking for small business loan volume was stronger than their deposit market share ranking.

St. Joseph MSA

Lending levels reflect adequate responsiveness to AA credit needs.

According to June 30, 2019, FDIC Deposit Market Share Report, UMB had \$134.4 million in deposits in the St. Joseph MSA. UMB had an 8.0 percent deposit market share. UMB's deposit market share ranked fifth out of 14 deposit-taking institutions in the AA. The bank's deposit market share ranked in the top 35.7 percent in the AA.

According to 2018 peer mortgage data, the bank had a 1.7 percent market share of home mortgage loan originations. The bank's market share of home mortgage loan originations was well below the bank deposit market share. The bank ranked 11th out of 173 mortgage lenders in the AA. The bank's home mortgage market share ranked in the top 6.4 percent in the AA. The bank's market share ranking was stronger than their deposit market share ranking.

According to 2018 peer small business data the bank had a 1.2 percent market share of small business loan originations. The bank's market share of small business loan originations was well below the bank deposit market share. The bank's market share of small business loan originations ranked 15th out of 53 small business lenders. The bank's market share ranking of small business loans was in the top 28.3 percent in the AA. The bank's market share ranking was stronger than their deposit market share ranking. The bank's market share of small business loan volume was 6.8 percent. The bank's market share of small business loan volume was weaker than the bank's deposit market share. The bank market share of small business loan volume ranked third out of 53 lenders in the AA. The bank's small business loan volume market share ranked in the top 5.7 percent in the AA. The bank's small business loan market share ranking was stronger than the bank's deposit market share ranking.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

The geographic distribution of home mortgage loans is excellent.

Refer to Table O 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 and purchases.

Joplin MSA

The geographic distribution of home mortgage loans is excellent. There are no low-income geographies in this AA. The percentage of loans in moderate-income tracts exceeds both the aggregate industry distribution of loans and the percentage of owner-occupied units in these geographies.

Springfield MSA

The geographic distribution of home mortgage loans is good. The percentage of loans in low-income tracts exceeds both the aggregate industry distribution of loans and the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income tracts is below both the aggregate industry distribution of loans and the percentage of owner-occupied units.

St. Joseph MSA

The geographic distribution of home mortgage loans is excellent

The percentage of loans in low-income geographies exceeds the percentage of owner-occupied housing and the aggregate industry distribution of home mortgage loans in those geographies. The percentage of loans in moderate-income tracts exceeds the aggregate industry distribution of loans and approximates to the percentage of owner-occupied units in these geographies.

Small Loans to Businesses

The geographic distribution of small loans to business is excellent.

Refer to Table Q in the state of Missouri section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Joplin MSA

The geographic distribution of small loans to businesses is excellent. There are no low-income geographies in this AA. The percentage of loans in moderate-income tracts exceeds the aggregate industry distribution of loans and approximates the percentage of businesses in those geographies.

Springfield MSA

The geographic distribution of small loans to businesses is excellent. The percentage of loans in both LMI tracts exceeds the aggregate industry distribution of loans and the percentage of businesses in LMI geographies, respectively.

St. Joseph MSA

The geographic distribution of small loans to businesses is good. The percentage of loans in low-income tracts is significantly below both the aggregate industry distribution of loans and the percentage of businesses in these geographies. The percentage of loans in moderate-income tracts exceeds both the aggregate industry distribution of loans and demographics.

Lending Gap Analysis

We reviewed supervisory data and other summary reports. We did not identify any unexplained conspicuous gaps in the bank's lending.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

The borrower distribution of home mortgage loans is adequate.

Refer to Table P 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.

Joplin MSA

The borrower distribution of home mortgage loans is excellent. The percentage of loans to low-income borrowers exceeds the aggregate industry distribution of loans to these borrowers and is below the percentage of low-income families in the AA. The percentage of loans to moderate-income borrowers exceeds the aggregate industry distribution of loans to these borrowers and the percentage of moderate-income families.

Springfield MSA

The borrower distribution of home mortgage loans is very poor. We gave consideration to the fact that housing is not affordable for low-income individuals.

The percentage of loans to both LMI borrowers is significantly below the aggregate industry distribution of loans to these borrowers and percentage of LMI families in the AA, respectively.

St. Joseph MSA

The borrower distribution of home mortgage loans is excellent. The percentage of loans to low-income borrowers exceeds the aggregate industry distribution of loans to these borrowers and is significantly below the percentage of low-income families in the AA. The percentage of loans to moderate-income borrowers exceeds both the aggregate industry distribution of loans to these borrowers and demographics.

Small Loans to Businesses

The borrower distribution of small loans to businesses is poor.

Refer to Table R 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.

Joplin MSA

The borrower distribution of small loans to businesses is poor. The percentage of small loans to businesses with gross annual revenues of \$1 million or less is significantly below both the aggregate distribution of loans to these businesses and the percentage of small businesses in the AA.

Springfield MSA

The borrower distribution of small loans to businesses is poor. The percentage of small loans to businesses with gross annual revenues of \$1 million or less is significantly below both the aggregate distribution of loans to these businesses and the percentage of small businesses in the AA.

St. Joseph MSA

The borrower distribution of small loans to businesses is adequate. The percentage of loans to businesses with gross annual revenues of \$1 million or less is below the aggregate distribution of loans to these businesses and significantly below the percentage of small businesses in the AA.

Community Development Lending

The institution made an adequate level of CD loans. CD loans had neutral impact on the Lending Test rating.

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

Joplin MSA

CD loans demonstrated excellent responsiveness to AA credit needs. UMB originated four qualified CD loans totaling \$2.6 million. This volume represented 20.2 percent of allocated tier 1 capital. The CD lending focused on economic development and consisted of three loans totaling \$1.1 million acquired from a certified community development loan fund and one \$1.5 million SBIC loan. CD lending was responsive to economic development.

Springfield MSA

During the evaluation period, the institution did not originate any qualified CD loans in the Springfield MSA.

St. Joseph MSA

CD lending demonstrated excellent responsiveness to AA credit needs. UMB originated one qualified CD loan of \$5.2 million loan to provide bridge financing for a LIHTC of a 48-unit affordable housing senior housing facility. This volume represented 29.3 percent of allocated tier 1 capital. CD lending was responsive to affordable housing needs in the AA.

Missouri – Statewide

We considered CD lending originated in the broader Missouri statewide area with a purpose, mandate, or function to serve the MSAs. During the evaluation period, UMB originated three loans totaling \$1.2 million to a non-profit entity for community services to LMI individuals in the statewide area with purpose, mandate or function to serve the bank's AAs. Additionally, UMB made one \$4.4 million LIHTC bridge construction loan for a 42-unit affordable senior housing facility with no purpose, mandate or function to serve UMB AA's in Missouri.

Product Innovation and Flexibility

The institution makes little use of innovative and/or flexible lending practices in order to serve AA credit needs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Jefferson City MSA and Columbia MSA is consistent with the bank's overall performance in the Lending Test. The bank's performance in the Missouri Non-MSA was stronger than their overall Lending Test performance. Stronger performance was due to excellent performance in borrower distribution of small loans to business. Additionally, the bank had excellent performance in geographical distribution of farm loans in LMI geographies and an excellent borrower distribution of farm loans. Performance in limited-scope AAs had a positive impact on the Lending Test, particularly due to performance in loans to farms in the Missouri Non-MSA.

INVESTMENT TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Joplin MSA and St. Joseph MSA is excellent and the performance in the Springfield MSA is good. The bank's statewide CD investments had a positive impact on the statewide CD investment rating.

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

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

Qualified Investments and Grants										
Assessment Area	Prior Period*		Current Period		Total**				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$***	#	\$(000's)
Columbia MSA	1	\$62	12	\$1,535	13	6.8	\$1,597	4.3	0	\$0
Jefferson City MSA	0	\$0	8	\$406	8	4.2	\$406	1.1	0	\$0
Joplin MSA	6	\$1,027	10	\$685	16	8.4	\$1,712	4.6	0	\$0
Missouri Non-MSA	10	\$1,032	21	\$2,477	31	16.2	\$3,509	9.5	0	\$0
Springfield MSA	3	\$391	16	\$2,279	19	9.9	\$2,670	7.2	0	\$0
St. Joseph MSA	0	\$0	18	\$1,779	18	9.4	\$1,779	4.8	0	\$0
Statewide	0	0	86	\$25,300	86	45.0	\$25,300	68.4	0	\$0

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

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

***Does not equal 100.0% due to rounding

Joplin MSA

UMB has an excellent level of qualified investments, particularly those not provided by private investors, often in a leadership position. UMB had 16 investments and donations in the Joplin MSA totaling \$685 thousand. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the AA. The remaining balance on four prior period investments was \$1.0 million. When considering both the current and prior period investments, the total of \$1.7 million represents 13.4 percent of allocated tier 1 capital. The bank's exhibits excellent responsiveness to credit and CD needs. All of the bank's CD investments focused on affordable housing needs in the AA. UMB identified affordable housing as a primary need within the AA. The bank responded to this need through the purchase of four MBS, totaling \$657 thousand, with the majority of underlying loans in LMI geographies.

Springfield MSA

UMB had a significant level of qualified investments, particularly those not provided by private investors, occasionally in a leadership position. UMB had 19 investments and donations in the Springfield MSA totaling \$2.7 million. CD investments equal 5.6 percent of allocated tier 1 capital. UMB exhibits good responsiveness to credit and CD needs. The bank's CD investments were responsive to affordable housing and community service needs. Affordable housing and financial literacy were identified as needs through the community contact. The bank met this need through purchasing a MBS benefitting LMI individuals. In addition, UMB took a leadership position by underwriting and purchasing a \$1.1 million school district bond where over 50.0 percent of the students are on the free or reduced lunch program. The bank also made small donations to support affordable housing and financial literacy.

St. Joseph MSA

UMB has an excellent level of qualified investments, particularly those not provided by private investors, often in a leadership position. UMB had 18 investments and donations in the St. Joseph MSA totaling \$1.8 million. This dollar amount represents 10.0 percent of allocated tier 1 capital.

The institution exhibits good responsiveness to credit and CD needs. UMB made investments in affordable housing by purchasing six MBS that included 14 loans to LMI individuals totaling \$1.8 million. UMB also supported various community service organizations with 12 donations totaling \$26 thousand.

Investments – Missouri Statewide

When considering the investments made in all AAs in the state, along with the investments in the greater Missouri statewide area, this performance had a significantly positive impact on the overall Investment Test rating in Missouri. In addition to the CD investments that benefit the bank's AAs, UMB made 85 qualifying investments and one donation totaling \$25.3 million. All 85 investments were school bonds, that benefitted LMI students throughout Missouri. UMB took a leadership position on nine of the bonds totaling \$1.5 million. In the vast majority of these nine school bonds, the bank was the underwriter and then subsequently purchased the bonds. The bank made a \$6 thousand donation to supports access to legal services to LMI individuals, and did have a purpose, mandate, or function to serve the bank's AAs in the state. The statewide investments contributed to the "Outstanding" rating.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s performance under the Investment Test in Columbia MSA and Missouri Non-MSA is consistent the bank’s overall Outstanding performance under the Investment Test in the full-scope areas. Performance in the Jefferson City MSA was weaker than performance under the Investment Test in the full-scope areas. Weaker performance was due to a lesser volume of CD investments measured against allocated tier 1 capital. Performance in limited-scope AAs had a neutral impact on the overall Investment Test rating.

SERVICE TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the Springfield MSA is excellent. The bank’s performance in the Joplin MSA and St. Joseph MSA is adequate.

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the AAs. In addition, based upon limited-scope reviews the bank’s performance in the Missouri Non-MSA AA had a positive impact on the overall Service Test rating.

Distribution of Branch Delivery System											
Assessment Area	Deposits % of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches* in AA	Branches				Population			
				Location of Branches by Income of Geographies (%)				% of Population within Each Geography**			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Columbia MSA	10.5	2	13.3	0.0	0.0	50.0	50.0	3.8	11.1	52.3	26.0
Jefferson City MSA	5.3	1	6.7	0.0	0.0	0.0	100.0	3.1	11.5	43.3	42.1
Joplin MSA	18.1	2	13.3	0.0	0.0	100.0	0.0	0.0	14.4	69.1	15.9
Missouri Non-MSA	33.7	6	40.0	0.0	16.7	83.3	0.0	0.9	5.3	74.1	19.7
Springfield MSA	16.9	2	13.3	0.0	100.0	0.0	0.0	4.7	19.7	54.8	19.6
St. Joseph MSA	15.5	2	13.3	0.0	0.0	100.0	0.0	2.0	26.7	45.8	25.5

*Does not equal 100.0 percent due to rounding
 **May not equal 100.0 percent due to N/A census tracts

Joplin MSA

Service delivery systems are reasonably accessible to portions of the AA, particularly moderate-income geographies and moderate-income individuals. UMB operates two branches and two deposit-taking

ATMs in the Joplin MSA AA, all in middle-income geographies. UMB does not have any branches or deposit-taking ATMs in moderate-income geographies. Demographic data shows 14.4 percent of the AA's population resided in moderate-income geographies. We gave consideration to the fact that a very small portion of the AA population lives in moderate-income geographies and that there are no low-income geographies in the AA. A considerable majority of the population resides in middle-income geographies. Additionally, the both bank branches were near to a moderate-income CTs. Bank analysis indicated that these branches served the residents of the moderate-income geographies.

Springfield MSA

Service delivery systems are readily accessible to geographies and individuals of different income levels. UMB operates two branches and two deposit-taking ATMs in the Springfield MSA AA, all in moderate-income geographies. The percentage of UMB's branches in moderate-income geographies significantly exceeds the percentage of population living in these geographies. UMB does not have any branches or deposit-taking ATMs in low-income geographies. We gave consideration to the fact that demographic data indicated that only 4.7 percent of the AA's population resided in low-income geographies.

St. Joseph MSA

Service delivery systems are reasonably accessible to portions of the AA, particularly LMI geographies. UMB operates two branches and two deposit-taking ATMs in the St. Joseph MSA, all in middle-income geographies. UMB does not have any branches or deposit-taking ATMs in LMI geographies. Only a small percentage of the population resides in low-income geographies.

Distribution of Branch Openings/Closings						
Assessment area	Branch Openings/Closings		Net change in Location of Branches (+ or -)			
	# of Branch Openings	# of Branch Closings	Low	Mod	Mid	Upp
Columbia MSA	0	0	0	0	0	0
Jefferson City MSA	0	0	0	0	0	0
Joplin MSA	0	0	0	0	0	0
Missouri Non-MSA	0	3	0	0	-3	0
Springfield MSA	0	1	0	0	-1	0
St. Joseph MSA	0	0	0	0	0	0

Joplin MSA

The bank did not open or close any branches, in LMI CTs, in the Joplin MSA throughout the evaluation period. The bank did close one branch in a middle-income CT. A bank analysis indicated the closure of

the branch would enable the bank to achieve operational savings and service their customers in nearby branches.

Services, including where appropriate, business hours do not vary in a way the inconveniences the various portions if it's AA, particularly LMI geographies and individuals. Services offered, and hours of operations are comparable among locations, regardless of the income level of the CT the branch resides.

Refer to the Scope of Evaluation section for information about alternative delivery systems. We did not place significant weight on these alternative delivery systems, as the bank did not maintain metrics to determine their effectiveness in helping meet the needs of LMI individuals or small businesses.

Springfield MSA

The bank did not open or close any branches, in LMI CTs, in the Springfield MSA throughout the evaluation period. The bank did close a branch in a middle-income CT. A bank analysis indicated the closure of the branch would enable the bank to achieve operational savings and service their customers in nearby branches.

Services, including where appropriate, business hours do not vary in a way the inconveniences the various portions if it's AA, particularly LMI geographies and individuals. Services offered, and hours of operations are comparable among locations, regardless of the income level of the CT the branch resides.

Refer to the Scope of Evaluation section for information about alternative delivery systems. We did not place significant weight on these alternative delivery systems, as the bank did not maintain metrics to determine their effectiveness in helping meet the needs of LMI individuals or small businesses.

St. Joseph MSA

The bank did not open or close any branches, in LMI CTs, in the St. Joseph MSA throughout the evaluation period.

Services, including where appropriate, business hours do not vary in a way the inconveniences the various portions if it's AA, particularly LMI geographies and individuals. Services offered, and hours of operations are comparable among locations, regardless of the income level of the CT the branch resides.

Refer to the Scope of Evaluation section for information about alternative delivery systems. We did not place significant weight on these alternative delivery systems, as the bank did not maintain metrics to determine their effectiveness in helping meet the needs of LMI individuals or small businesses.

Community Development Services

The institution provides a relatively high level of CD services.

Joplin MSA

The bank provides a relatively high level of CD services. CD services in the Joplin MSA include one employee participating in three activities, performing 196 hours of community service-related activities at one organization. The employee served as Executive Director for the organization that provides a

year-long support program to children with cancer and their families. The youth program primarily serves LMI income persons.

Springfield MSA

The bank provides a relatively high level of CD services. CD services in the Springfield MSA include four individuals participating in seven activities, performing 180 hours of community service-related activities at three organizations; and one individual participating in one activity, performing three hours of affordable housing related activities at one organization; for a total of five individuals participating in seven activities performing 183 community development volunteer service hours.

In the Springfield MSA, one employee provided their expertise in non-leadership roles to CD organizations for a total of three hours. Three other employees served either as directors, committee members, or officers to various CD organizations for a total of 180 hours. The following is an example of the CD services provided in the AA:

- During the evaluation period, two employees served on the board of directors at a non-profit organization that provides shelter, advocacy and education to survivors of domestic violence targeted to LMI individuals for a total of 162 hours.

St. Joseph MSA

The bank provides an adequate level of CD services. CD services in the St. Joseph MSA include 10 individuals participating in 20 activities, performing 60 hours of community service-related activities at one organization. Ten employees provided their expertise in non-leadership rolls to a CD organization that provides several social service and homelessness reduction programs that serves LMI individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Columbia MSA and Jefferson City MSA is weaker than the bank's overall performance under the Service Test in the full-scope area. Weaker performance was due to the fact there are no branches in LMI CTs. The bank's performance in the Missouri Non-MSA is stronger than the bank's overall performance in the Service Test. Stronger performance is due to excellent branch distribution. Performance in the Limited-scope reviews had a neutral impact on the overall Service Test rating. Neutral impact was due to limited number of branches in these AAs and the low percentage of LMI geographies.

State Rating

State of Nebraska

CRA rating for the State of Nebraska: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect good responsiveness to the AA credit needs.
- The bank exhibited adequate geographical distribution of loans and poor borrower distribution of loans.
- The bank is a leader in providing CD loans in the AA. CD lending had a positive impact on the overall Lending Test rating in Nebraska.
- The institution has an adequate level of qualified CD investments and grants. CD investments were responsive to identified community needs.
- The institution provides a relatively high level of CD services.

Description of Institution’s Operations in Nebraska

UMB had one AA within the state of Nebraska, the Omaha MSA. This AA includes Douglas County in Nebraska. This AA complies with CRA regulations and does not arbitrarily exclude LMI geographies.

UMB offers a full range of loan and deposit products and services in one full-service branch within the Omaha MSA. Lending is focused on home mortgages and small business loans. The branch represents 1.1 percent of the total branch network. UMB has one deposit-taking ATM. Strong competition exists for financial services within the Omaha MSA. According to the June 30, 2019, FDIC Deposit Market Share Report, UMB held \$96.3 million in deposits and ranked 22nd out of 34 financial institutions, representing a 0.4 percent deposit market share. During the evaluation period, 0.5 percent of bank deposits were in Nebraska. Nebraska accounted for 0.7 percent and 1.5 percent of loan originations and loan volume, respectively. Competition includes large regional banks, large nationwide institutions, and community banks. The top five competitors had 74.5 percent of the deposit market share within this AA.

According to the U.S. Bureau of Labor Statistics, as of December 31, 2019, the unemployment rate in the Omaha MSA was 2.9 percent, which was lower than the national average of 3.5 percent.

To help identify needs and opportunities in the Omaha MSA, the OCC utilized two regulatory agency contacts with organizations that provide housing services and small business economic development assistance. The first community contact indicated that having additional capital made available for large scale affordable housing developments is a need. The second contact indicated that there are opportunities for small business lending in LMI tracts. The contacts both reported that the local financial institutions participate in providing credit needs and are willing to loan to qualified borrowers.

Please refer to the Demographic Information for the Omaha MSA in Table A below for detailed demographics and other performance context information for AAs that received full-scope reviews.

Table A - Demographic Information of the Assessment Area

Assessment Area: Omaha MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	156	17.3	24.4	33.3	25.0	0.0
Population by Geography	537,655	13.6	24.4	34.8	27.2	0.0
Housing Units by Geography	225,046	13.9	24.9	36.8	24.4	0.0
Owner-Occupied Units by Geography	128,781	7.6	21.8	37.0	33.5	0.0
Occupied Rental Units by Geography	79,760	20.9	29.6	37.7	11.8	0.0
Vacant Units by Geography	16,505	29.1	26.4	30.8	13.7	0.0
Businesses by Geography	34,507	8.0	18.1	43.9	30.0	0.0
Farms by Geography	984	4.6	14.1	44.5	36.8	0.0
Family Distribution by Income Level	129,038	23.0	17.8	19.7	39.5	0.0
Household Distribution by Income Level	208,541	26.1	16.6	17.8	39.5	0.0
Median Family Income MSA - 36540 Omaha-Council Bluffs, NE-IA MSA		\$73,632	Median Housing Value			\$151,602
			Median Gross Rent			\$824
			Families Below Poverty Level			10.5%
<i>Source: 2015 ACS Census and 2018 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Nebraska

In Nebraska we completed a full-scope review of the Omaha MSA. Of the loans originated in the Omaha MSA, throughout the evaluation period, 36.5 percent were home mortgage loans and 63.5 percent were small business loans. For the Lending Test, we gave more weight to CRA small business loans, due to the fact they represent larger percentage of loan originations and loan volume in Nebraska.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEBRASKA

LENDING TEST

The bank's performance under the Lending Test in Nebraska is rated Low Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews the bank's performance in the Omaha MSA is adequate.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Omaha MSA	27	47	0	3	77	97.4	100.0
Statewide	0	0	0	2	2	2.6	0.0

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

Dollar Volume of Loans* (000's)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Omaha MSA	\$29,075	\$11,387	\$0	\$835	\$41,297	41.8	100.0
Statewide	\$0	\$0	\$0	\$58,600	\$58,600	58.2	0.0

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

According to June 30, 2019, FDIC Deposit Market Share Report, UMB had \$96.3 million in deposits. The bank had a 0.4 percent deposit market share in the Omaha MSA. The bank's deposit market share ranked 22nd out of 34 deposit-taking institutions in the Omaha MSA. The bank's deposit market share ranked in the top 64.7 percent in the AA.

According to June 30, 2018, peer mortgage data, UMB had less than a 0.1 percent market share of home mortgage loan originations. The bank's home mortgage loan origination market share was well below their deposit market share. The bank's home mortgage loan origination market share ranked 161st out of 322 lenders in the AA. The bank's market share of home mortgage loan originations ranked in the top 50.0 percent in the AA. The bank's home mortgage loan origination market share ranking was stronger than their deposit market share ranking.

According to June 30, 2018, peer small business data, UMB had a 0.1 percent market share of small business loan originations. The bank's market share of small business loan originations was well below the bank's deposit market share. The bank's small business loan origination market share ranked 31st out of 92 small business lenders in the AA. The bank's market share of small business loan originations ranked in the top 33.7 percent in the AA. The bank's market share ranking of small business loan originations was stronger than their deposit market share ranking. The bank's market share of small business loan volume was 0.7 percent. The bank's market share of small business loan volume was stronger than their deposit market share. The bank's market share of small business loan volume ranked 18th out of 92 small business lenders in the AA. The bank's market share ranking of small business loan volume ranked in the top 33.7 percent. The bank's market share ranking of small business loan volume was stronger than their deposit market share ranking.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Table O 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 and purchases.

The geographic distribution of home mortgage loans is poor. The percentage of loans in LMI tracts is significantly below the aggregate industry distribution of loans and the percentage of owner-occupied units in these geographies, respectively.

Small Loans to Businesses

Refer to Table Q in the state of Nebraska section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is adequate. The percentage of loans in low-income tracts is significantly below both the aggregate industry distribution of loans and the percentage of businesses in these geographies. The percentage of loans in moderate-income tracts exceeds both the aggregate industry distribution of loans and the percentage of businesses in those geographies.

Lending Gap Analysis

We reviewed supervisory data and other summary reports. We did not identify any conspicuous gaps in the bank's lending.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a poor distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table P 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 borrower distribution of home mortgage loans is poor. The percentage of loans to low-income borrowers is below the aggregate industry distribution of loans to these borrowers and is significantly below the percentage of low-income families. The percentage of loans to moderate-income borrowers is significantly below both the aggregate industry distribution of loans to these borrowers and the percentage of moderate-income families.

Small Loans to Businesses

Refer to Table R 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 borrower distribution of small loans to businesses is poor. The percentage of loans to businesses with gross annual revenues of \$1 million or less is significantly below both the aggregate distribution of loans to these businesses and the percentage of small businesses in the AA.

Community Development Lending

The institution is a leader in making CD loans in the Omaha MSA. CD lending had a positive impact on its lending performance in the AA.

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

During the evaluation period, the bank originated one qualified CD loan totaling \$4.5 million for economic development to a non-profit 501(c)3 small business entity. This volume represented 23.6 percent of allocated tier 1 capital. The economic development loan created new LMI jobs and demonstrated excellent responsiveness to AA needs.

Nebraska – Statewide

CD lending in the state of Nebraska had a positive impact on the Lending Test performance in the state of Nebraska. Two loans totaling \$58.6 million serve the state of Nebraska with no purpose, mandate, or function to serve the AA in the state. The CD loans purpose was revitalization and stabilization.

Product Innovation and Flexibility

The institution makes little use of innovative and/or flexible lending practices in order to serve AA credit needs.

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

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

The institution exhibits good responsiveness to credit and community economic development needs. The institution occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified Investments and Grants										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Omaha MSA	2	\$235	8	\$631	10	100.0	\$866	100.0	0	0

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

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

UMB had 10 investments and grants totaling approximately \$866 thousand. This includes two prior period investments totaling \$235 thousand and one current period investment equaling \$600 thousand. Additionally, seven grants totaling \$31 thousand were made for a total CD investment and grants of \$866 thousand. CD investments and grants were equivalent to 4.6 percent of allocated tier 1 capital.

The bank’s qualified CD investments in the AA included a LIHTC bond for \$600 thousand, which was designated for use in the Omaha MSA. This portion of the bond supported three different affordable housing communities with a total of 120-units. Additionally, UMB provided two grants within the evaluation period totaling \$10 thousand to an organization that offers an online platform to provide financial education to grade school level students. The program educates the students on topics such as saving, banking, credit cards, and interest rates. The students attend local schools where the majority of all the students are eligible for free or reduced lunches.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Omaha MSA	100.0	1	100.0	0.0	0.0	0.0	100.0	13.6	24.4	34.8	27.2

UMB operates one branch and one deposit-taking ATM in the Omaha MSA in an upper-income geography. UMB does not have any branches or deposit-taking ATMs in LMI geographies. Demographic data shows 13.6 percent and 24.4 percent of the AA’s population residing in low-income and moderate-income geographies, respectively. We gave consideration to the fact that UMB has one branch in the Omaha MSA and that a majority of the population lives in either a middle- or upper-income CT.

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

The bank did not open or close any branches in the Omaha MSA throughout the evaluation period.

Services, including where appropriate, business hours do not vary in a way the inconveniences the various portions if it's AA, particularly LMI geographies and individuals.

Refer to the Scope of Evaluation section for information about alternative delivery systems. We did not place significant weight on these alternative delivery systems, as the bank did not maintain metrics to determine their effectiveness in helping meet the needs of LMI individuals or small businesses.

Community Development Services

The institution provides a relatively high level of CD services. CD services in the Omaha MSA include five individuals participating in 11 activities, performing 370 hours of CD service-related activities at five organizations.

In the Omaha MSA, five employees served either as directors, committee members, or officers to various CD organizations and one of the five also provided their expertise in a non-leadership role for a total of 370 hours. The following is an example of the CD services provided in the AA:

- During the evaluation period, one employee served on the board of directors at an organization whose mission is to impact poverty by addressing basic needs and fostering success in the classroom and the workplace, serving those who are living in or at risk of living in poverty for a total of 180 hours.

State Rating

State of Oklahoma

CRA rating for the State of Oklahoma: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: Needs to Improve

The major factors that support this rating include:

- Lending levels reflect good responsiveness to community needs.
- The institution as a good geographical distribution of loans and an adequate borrower distribution of loans.
- The institution made a relatively high level of CD loans that were responsive to economic development needs of the AA. CD lending had a positive impact on the Lending Test rating.
- The institution has a significant level of qualified CD investments. Statewide CD investments had a positive impact on the Investment Test rating.
- Delivery systems are unreasonably inaccessible to portions of the AA, particularly LMI geographies and/or LMI individuals.

Description of Institution's Operations in Oklahoma

UMB had two AAs within the State of Oklahoma. These AAs are the Oklahoma City MSA comprised of Oklahoma County and the Tulsa MSA comprised of Tulsa County. These AAs comply with CRA regulations and do not arbitrarily exclude LMI geographies.

UMB offers a full range of loan, deposit products, and services through three full-service branches within Oklahoma. Lending is focused on home mortgages and small business loans. The branches in Oklahoma represent 3.2 percent of UMB's branch network. UMB has one deposit-taking ATM in Oklahoma. As of June 30, 2019, UMB held \$211.0 million in statewide deposits and ranked 89th in the state out of 223 deposit-taking institutions, representing a 0.2 percent market share. During the evaluation period, 1.1 percent of bank deposits and 2.6 percent of loans by dollar and 2.8 percent by number were in Oklahoma. In our ratings in Oklahoma, we gave more weight to performance in the Oklahoma City MSA. We gave more weight to UMB's performance in the Oklahoma City MSA due to the facts that it accounts for 85.5 percent of total deposits, 70.4 percent of loan volume, and 75.2 percent of loan originations in Oklahoma.

Oklahoma City MSA

Strong competition exists for financial services within the Oklahoma City MSA. According to the June 30, 2019, FDIC Deposit Market Share Report, UMB ranked 30th out of 58 depository financial institutions in the AA, with a 0.7 percent market share and \$180.3 million in deposits. Competition includes large regional banks, large nationwide banks, and community banks. The top five competitors have 58.9 percent of the deposit market share within this AA.

According to the U.S. Bureau of Labor Statistics, as of December 31, 2019, the unemployment rate in the Oklahoma City MSA was 2.9 percent, which was lower than the national average of 3.5 percent.

To help identify needs and opportunities in the Oklahoma City MSA, the OCC utilized two regulatory agency contacts with organizations that provides assistance to new and existing businesses and one for affordable housing and housing assistance to LMI individuals. The first community contact indicated

that there are opportunities for banks to assist in low-income housing developments. The second contact indicated needs for affordable housing aimed at LMI individuals and assistance in obtaining credit.

Table A - Demographic Information of the Assessment Area

Assessment Area: Oklahoma City MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	241	11.6	35.3	29.0	20.7	3.3
Population by Geography	754,480	10.6	32.4	29.7	26.9	0.4
Housing Units by Geography	326,985	10.2	34.0	29.9	25.4	0.5
Owner-Occupied Units by Geography	171,014	6.1	25.8	32.5	35.4	0.1
Occupied Rental Units by Geography	120,376	14.5	43.1	27.2	14.2	0.9
Vacant Units by Geography	35,595	15.5	42.1	26.7	14.9	0.8
Businesses by Geography	60,424	6.6	26.2	30.5	32.3	4.5
Farms by Geography	1,298	5.0	22.1	30.4	41.2	1.3
Family Distribution by Income Level	181,431	24.7	17.9	19.1	38.3	0.0
Household Distribution by Income Level	291,390	26.1	17.7	17.5	38.7	0.0
Median Family Income MSA - 36420 Oklahoma City, OK MSA		\$64,058	Median Housing Value			\$135,429
			Median Gross Rent			\$794
			Families Below Poverty Level			13.8%

Source: 2015 ACS Census and 2018 D&B Data

Due to rounding, totals may not equal 100.0

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

Tulsa MSA

Strong competition exists within the Tulsa MSA. According to the June 30, 2019, FDIC Deposit Market Share Report, UMB ranked 38th of 44 depository financial institutions in the AA with a 0.1 percent market share and \$30.7 million in deposits. Competition includes large regional banks, institutions with a nationwide presence, and community banks. The top five competitors have 58.8 percent of the deposit market share within this AA. The Tulsa MSA has 78 total loans which account for 24.8 percent of total loan originations in the state of Oklahoma.

According to the U.S. Bureau of Labor Statistics, as of December 31, 2019, the unemployment rate in the Tulsa MSA was 3.0 percent, which was lower than the national average of 3.5 percent.

To help identify needs and opportunities in the Tulsa MSA, the OCC utilized two regulatory agency contacts with organizations that provide community services for children and parents and one for lending to small business projects needing assistance. The first community contact indicated that there are opportunities for banks to assist in low-income housing. The second contact indicated needs for helping first-time business owners and start-up business assistance.

Table A - Demographic Information of the Assessment Area

Assessment Area: Tulsa MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	175	9.7	30.9	29.1	30.3	0.0
Population by Geography	623,335	8.0	26.8	31.2	33.9	0.0
Housing Units by Geography	274,891	8.3	28.2	31.8	31.6	0.0
Owner-Occupied Units by Geography	146,793	4.5	20.5	32.9	42.1	0.0
Occupied Rental Units by Geography	99,287	12.4	36.9	31.6	19.1	0.0
Vacant Units by Geography	28,811	13.6	37.3	27.3	21.8	0.0
Businesses by Geography	56,818	4.0	22.5	34.4	39.1	0.0
Farms by Geography	1,139	3.1	17.6	40.6	38.8	0.0
Family Distribution by Income Level	156,574	22.0	16.9	19.6	41.4	0.0
Household Distribution by Income Level	246,080	24.4	16.5	17.7	41.5	0.0
Median Family Income MSA - 46140 Tulsa, OK MSA		\$61,182	Median Housing Value			\$141,333
			Median Gross Rent			\$783
			Families Below Poverty Level			12.3%
<i>Source: 2015 ACS Census and 2018 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Oklahoma

For the state of Oklahoma, we completed full-scope reviews for the Oklahoma City MSA and the Tulsa MSA. UMB's performance in the Oklahoma City MSA is weighted most heavily in arriving at the overall conclusion for the state, as it had a majority of the loans and deposits in Oklahoma. Of the HMDA and CRA small business loans that were originated in Oklahoma throughout the evaluation period, 75.2 percent of loans by number and 70.4 percent by dollar were originated or purchased in the Oklahoma City MSA. Of the loans originated in the Oklahoma City MSA throughout the evaluation period, 43.2 percent were home mortgage loans and 56.8 percent were small business loans. Of the loans originated in the Tulsa MSA throughout the evaluation period, 31.2 percent were home mortgage loans and 68.8 percent were small business loans. For the Lending Test we gave the greatest weight to CRA small business loans due to the larger percentage of lending by both number and dollar in each MSA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OKLAHOMA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on full-scope reviews, the bank's performance in the Oklahoma City MSA is good. The bank's performance in the Tulsa MSA is adequate.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Oklahoma City MSA	101	133	0	2	236	75.2	85.5
Tulsa MSA	24	53	0	1	78	24.8	14.5

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

Dollar Volume of Loans* (000's)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Oklahoma City MSA	\$14,973	\$36,098	\$0	\$1,647	\$52,718	70.6	85.5
Tulsa MSA	\$4,803	\$16,715	\$0	\$395	\$21,913	29.4	14.5

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

Oklahoma City MSA

Lending levels reflect good responsiveness to AA credit needs.

According to FDIC Deposit Market Share Report, UMB had a \$180.3 million in deposits in the Omaha MSA. The bank had a 0.7 percent deposit market share in the Oklahoma City MSA. The bank's deposit market share ranked 30th out of 58 deposit-taking institutions. The bank's market share ranking was in the top 51.7 percent in the AA.

According to 2018 peer mortgage data, the bank had a 0.2 percent market share of home mortgage loan originations in the Oklahoma City MSA. The bank's market share of home mortgage loan originations was weaker than their deposit market share. The bank's market share of home mortgage originations ranked 96th out of 415 lenders. The bank's market share ranking was in the top 46.32 percent in the AA. The bank's market share ranking of home mortgage loan originations was stronger than the bank's deposit market share ranking.

According to 2018 peer small business data, the bank has a 0.1 percent market share of small business loan originations. The bank's market share of small business loan originations was weaker than their deposit market share. The bank's market share of small business loan originations ranked 33rd out 106 small business lenders. The market share ranking of small business loan originations was in the top 31.1 percent in the AA. The bank's market share ranking of small business loan originations was stronger than their deposit market share ranking. The bank had a 0.7 percent market share of small business loan volume. The bank's market share of small business loan volume approximates the bank's deposit market share. The bank's market share of small business loan volume ranked 18th out of 94 lenders. The bank's market share ranking of small business loan volume ranked in the top 19.1 percent of all lenders. The bank's market share ranking of small business loan volume was stronger than their deposit market share ranking.

Tulsa MSA

Lending levels reflect good responsiveness to AA credit needs

According to June 30, 2019, FDIC Market Share Report, UMB had \$30.7 million in deposits in the Tulsa MSA. The bank had a 0.1 percent deposit market share in the Tulsa MSA. The bank's deposit market share ranked 37th out of 44 deposit-taking institutions. The bank's deposit market share ranked in the top 84.1 percent in the AA.

According to 2018 peer mortgage data, UMB had less than a 0.1 percent market share of home mortgage loan originations. The bank's market share of home mortgage loan originations was weaker than their deposit market share. The bank's market share of home mortgage originations ranked 170th out of 367 lenders. The bank's market share of home mortgage originations was in the top 46.3 of all lenders in the AA. The bank market share ranking of home mortgage loan originations was stronger than their deposit market share ranking.

According to 2018 peer small business data, the bank had a 0.1 percent market share of small business loan originations. The bank's market share of small business loan originations approximates the bank's deposit market share. The bank's market share of small business loan originations ranked 46th out of 109 small business lenders. The bank's market share rank of small business loan originations ranked in the top 42.2 percent in the AA. The bank's market share of small business loan originations was stronger than their deposit market share rank. The bank had a 0.9 percent market share of small business loan volume. The bank's market share of small business loan volume was stronger than their deposit market share. The bank's market share of small business loan volume ranked 24th out of 109 small business lenders. The bank's market share ranking of small business loan volume was stronger than their deposit market share ranking.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

The geographic distribution of home mortgage loans is good.

Oklahoma City MSA

The geographic distribution of home mortgage loans is good. The percentage of loans in low-income tracts exceeds the aggregate industry distribution of loans and is near to the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income tracts is below the aggregate industry distribution of loans and is significantly below the percentage of owner-occupied units.

Tulsa MSA

The geographic distribution of home mortgage loans is adequate. We gave consideration to the fact that rental and vacant units in low-income tracts are 53.7 percent and 17.2 percent, respectively. There are

limited lending opportunities in low-income geographies with less than five percent owner-occupied units and less than two percent aggregate industry lending.

The bank did not originate or purchase any loans in low-income geographies. The percentage of loans in moderate-income tracts is near to the aggregate industry distribution of loans and is significantly below the percentage of owner-occupied units in these geographies.

Small Loans to Businesses

Refer to Table Q in the state of Oklahoma section of appendix D for the facts and data used to evaluate the geographic distribution of the bank’s originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is good.

Oklahoma City MSA

The geographic distribution of small loans to businesses is good. The percentage of loans in low-income tracts exceeds both the aggregate industry distribution of loans and the percentage of businesses in these geographies. The percentage of loans in moderate-income tracts is somewhat near to the aggregate industry distribution of loans and below the percentage of businesses in those geographies.

Tulsa MSA

The geographic distribution of small loans to businesses is excellent. The percentage of loans in both LMI tracts exceeds the aggregate industry distribution of loans and the percentage of businesses in LMI geographies, respectively.

Lending Gap Analysis

We reviewed supervisory data and other summary reports. We did not identify any conspicuous gaps in the bank’s lending.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels and business of different sizes given the product lines offered by the institution.

Home Mortgage Loans

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

The borrower distribution of home mortgage loans is good.

Oklahoma City MSA

The borrower distribution of home mortgage loans is good. The percentage of loans to low-income borrowers exceeds the aggregate industry distribution of loans to these borrowers and is below the percentage of low-income families in the AA. The percentage of loans to moderate-income borrowers is

below ~~exceeds~~ the aggregate industry distribution and is below the percentage of moderate-income families.

Tulsa MSA

The borrower distribution of home mortgage loans is good. The percentage of loans to low-income borrowers is below the aggregate industry distribution of loans to these borrowers and significantly below the percentage of low-income families. The percentage of loans to moderate-income borrowers exceeds the aggregate industry distribution of loans to these borrowers and the percentage of moderate-income borrowers.

Small Loans to Businesses

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

The borrower distribution of small loans to business is adequate.

Oklahoma City MSA

The borrower distribution of small loans to businesses is adequate. We gave consideration to the fact that 12.3 percent of the bank's small loans to business did not have revenue information. The percentage of loans to businesses with gross annual revenues of \$1 million or less is below the aggregate distribution and significantly below the percentage of small businesses in the AA.

Tulsa MSA

The borrower distribution of small loans to businesses is poor. The percentage of loans to businesses with gross annual revenues of \$1 million or less is significantly below both the aggregate distribution of loans to these businesses and the percentage of small businesses in the AA.

Community Development Lending

The institution has made an adequate level of CD loans. CD lending had a neutral impact on the Lending Test performance in the state of Oklahoma.

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

Oklahoma City MSA

The bank made a relatively high level of CD loans in the Oklahoma City MSA. During the evaluation period, UMB originated one qualified CD loan totaling \$3.0 million. This volume represented 8.8 percent of allocated tier 1 capital. CD lending was responsive to community needs. CD lending focused on economic development and provided job creation for LMI individuals.

Tulsa MSA

During the evaluation period, the institution did not originate any qualified CD loans in the Tulsa MSA.

Product Innovation and Flexibility

The institution makes little use of innovative and/or flexible lending practices in order to serve AA credit needs.

INVESTMENT TEST

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

Conclusions for areas Receiving Full-Scope Reviews

Based on a full-scope review the bank's performance in the Oklahoma City MSA is good and the Tulsa MSA is adequate. Performance in the greater statewide area had a positive impact on the Investment Test rating.

The institution has a significant level of qualified CD investment and grants, particularly those that are not routinely provided by private investors.

The institution exhibits good responsiveness to credit and community economic development needs. The institution makes significant use of innovative and/or complex CD investments.

Qualified Investments and Grants										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Oklahoma City MSA	1	\$309	10	\$1,376	11	8.9	\$1,685	3.8	0	\$0
Tulsa MSA	0	\$0	3	\$405	3	2.4	\$405	0.9	0	\$0
Statewide	0	\$0	110	\$42,600	110	88.7	\$42,600	95.3	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.

Oklahoma City MSA

The institution has a significant level of CD investments and grants, particularly those not provided by private investors and occasionally in a leadership position. UMB had one investment, and nine donations in the Oklahoma City MSA totaling \$1.7 million. There was one prior period investment within the AA for \$309 thousand. The total of \$1.7 million represents 4.9 percent of allocated tier 1 capital for the AA.

UMB's responsiveness to CD needs in the AA is excellent. In terms of dollar volume 100.0 percent of the bank's CD investments were allocated to supporting affording housing needs. The bank met this need through one MBS. In addition, all nine donations totaling \$38 thousand were deemed to be responsive based on the bank's needs assessment. These donations were for community services such as youth services such as financial literacy, education, and training for job readiness. Examples of

investments made during the evaluation period include a \$1.3 million investment in an MBS that supports affordable housing for LMI individuals.

Tulsa MSA

The institution exhibits a poor level of qualified investments, particularly those not provided by private investors. UMB made one investment, and two donations in Tulsa MSA totaling \$405 thousand. The total of the \$405 thousand represents 3.7 percent of allocated tier 1 capital for the AA. UMB’s CD investments were responsive to the affordable housing needs of the community. The bank met this need through one MBS.

Investments – Oklahoma statewide

UMB made 110 investments which totaled \$42.6 million and were comprised strictly of school bonds that have no PMF. UMB purchased the bonds and was the underwriter for 48.1 percent by number and 56.1 percent by dollar. The bank provided a leadership role in the issuing of the bonds. Statewide investments had a positive impact on the Investment Test rating.

SERVICE TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

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

Retail Banking Services

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

Distribution of Branch Delivery System												
Assessment Area	Deposits	Branches							Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography*			
				Low	Mod	Mid	Upp	N/A	Low	Mod	Mid	Upp
Oklahoma City MSA	85.5	2	66.7	0.0	0.0	0.0	50.0	50.0	10.6	32.4	29.7	26.9
Tulsa MSA	14.5	1	33.3	0.0	0.0	0.0	100.0	0.0	8.0	26.8	31.2	33.9

*Does not equal 100 percent due to N/A census tracts

Oklahoma City MSA

Service delivery systems are reasonably accessible to portions of the Oklahoma City MSA, particularly LMI geographies and/or LMI individuals. UMB operates two branches, one in an upper-income CT and one in a CT without an assigned income level. The bank also operates one deposit-taking ATM in an upper-income geography. UMB does not have any branches or deposit-taking ATMs in LMI

geographies. The bank has one branch near to LMI geographies. Bank data indicates that this branch is effective in serving the needs of nearby LMI geographies and individuals.

Tulsa MSA

Service delivery systems are reasonably accessible to portions of the Tulsa MSA, particularly LMI geographies and/or LMI individuals. UMB operates one branch in an upper-income CT. UMB does not have any branches or deposit-taking ATMs in low-income or moderate-income geographies.

Distribution of Branch Openings/Closings						
Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Oklahoma City MSA	0	2	0	-1	-1	0
Tulsa MSA	0	0	0	0	0	0

Oklahoma City MSA

To the extent changes have been made, the institution’s opening and closing of branches has adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. UMB closed two branches throughout the evaluation period, including its only branch in a moderate-income tract. A bank analysis indicated closures of these branches would enable the bank to achieve operational savings and service their customers in nearby branches. The bank did not open a branch in the AA.

Services, including where appropriate, business hours do not vary in a way that inconveniences the various portion of its AA, particularly LMI geographies and/or individuals.

Refer to the Scope of Evaluation section for information about alternative delivery systems. We did not place significant weight on these alternative delivery systems, as the bank did not maintain metrics to determine their effectiveness in helping meet the needs of LMI individuals or small businesses.

Tulsa MSA

UMB did not open or close any branches during the evaluation period in the Tulsa MSA.

Bank products and services, including where appropriate, business hours, do not vary in a way that inconveniences, the various portions of its AA, particularly LMI geographies and/or individuals.

Refer to the Scope of Evaluation section for information about alternative delivery systems. We did not place significant weight on these alternative delivery systems, as the bank did not maintain metrics to determine their effectiveness in helping meet the needs of LMI individuals or small businesses.

Community Development Services

The institution provides an adequate level of CD services.

Oklahoma City MSA

CD services in the Oklahoma City MSA include three individuals participating in three activities, performing 78 hours of community service-related activities at three organizations.

In the Oklahoma City MSA, one employee provided their expertise in a non-leadership role for a total of 28 hours. Two other employees served either as directors, committee members, or officers to two CD organizations for a total of 50 hours. The following is an example of the CD services provided in the AA:

- During the evaluation period, one employee provided financial education to an organization that primarily serves LMI students for a total of 28 hours.

Tulsa MSA

CD services in the Tulsa MSA include two individuals participating in three activities, performing 51 hours of community service-related activities at two organizations.

In the Tulsa MSA, one employee provided their expertise in a non-leadership role for a total of 15 hours. One other employee served as a board member to a CD organization for a total of 36 hours. The following is an example of the CD services provided in the AA:

- During the evaluation period, one employee served as a board member for an organization that conducts fundraising for local non-profit charities that have a primary mission to assist LMI individuals with social services for a total of 36 hours.

State Rating

State of Texas

CRA rating for the State of Texas: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect good responsiveness to AA credit needs.
- The bank exhibits a good geographical distribution of loans and an adequate borrower distribution of loans.
- The bank is a leader in making CD loans. CD lending was responsive to identified community needs. CD lending had a significantly positive impact on the Lending Test rating.

- The institution has an adequate level of qualified CD investments and grants.
- Service delivery systems are reasonably accessible LMI geographies and individuals.

Description of Institution's Operations in Texas

UMB has one AA within Texas, the Dallas MSA. This AA consists of Collin, Dallas, Denton, and Tarrant Counties. This AA complies with CRA regulations and does not arbitrarily exclude LMI geographies.

UMB offers a full range of loan, deposit products, and services through five full-service branches within the Dallas MSA. Lending is focused on home mortgages and small business loans. The branches represent 5.3 percent of the total branch network. UMB has three deposit-taking ATMs in the Dallas MSA. Strong competition exists for financial services within the Dallas MSA. According to the June 30, 2019, FDIC Deposit Market Share Report, UMB held \$267.4 million in deposits and ranked 56th out of 148 financial institutions, with a 0.1 percent deposit market share. During the evaluation period, the Dallas MSA accounted for 1.4 percent of bank-wide deposits, 3.4 percent of loan originations, and 5.3 percent of loan dollar volume. Competition includes large regional banks, large nationwide banks, and community banks. The top five competitors have 69.2 percent of the deposit market share within this AA.

According to the U.S. Bureau of Labor Statistics, as of December 31, 2019, the unemployment rate in the Dallas/Ft. Worth MSA was 2.9 percent, which was lower than the national average of 3.5 percent.

To help identify needs and opportunities in the Dallas MSA, the OCC utilized a regulatory agency contact with an organization that provides economic services and economic development assistance. The community contact indicated that primary needs are financing for start-up businesses as the primary credit need. The contact reported that the local financial institutions have a good reputation.

Please refer to the Demographic Information for the Dallas MSA in Table A below for detailed demographics and other performance context information for AAs that received full-scope reviews.

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,175	13.8	26.4	25.7	33.5	0.6
Population by Geography	5,993,595	11.7	26.1	27.3	34.8	0.1
Housing Units by Geography	2,291,892	12.2	24.8	27.9	35.0	0.2
Owner-Occupied Units by Geography	1,230,948	5.5	20.2	28.7	45.5	0.1
Occupied Rental Units by Geography	887,170	19.5	30.4	27.4	22.3	0.4
Vacant Units by Geography	173,774	21.5	28.6	24.4	25.2	0.3
Businesses by Geography	512,369	7.4	19.4	26.0	46.5	0.7
Farms by Geography	8,917	5.7	17.5	29.7	46.7	0.5
Family Distribution by Income Level	1,452,003	23.8	16.4	17.9	42.0	0.0
Household Distribution by Income Level	2,118,118	24.0	16.5	17.7	41.8	0.0

Median Family Income MSA - 19124 Dallas-Plano-Irving, TX	\$71,149	Median Housing Value	\$180,162
Median Family Income MSA - 23104 Fort Worth-Arlington-Grapevine, TX	\$69,339	Median Gross Rent	\$982
		Families Below Poverty Level	11.7%
<i>Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.</i>			

Scope of Evaluation in Texas

For the state of Texas, we completed a full-scope review of the only AA, the Dallas MSA. Of the loans originated in the Dallas MSA throughout the evaluation period, 32.1 percent were home mortgage loans and 67.9 percent were small business. For the Lending Test, we gave more weight to CRA small business loans due to the fact they make up a larger percentage of loan originations and loan volume.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TEXAS

LENDING TEST

The bank's performance under the Lending Test in Texas is rated High Satisfactory.

Conclusions for Area Receiving a Full-scope Review

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

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Dallas MSA	123	260	0	6	389	100.0	100.0
Statewide	0	0	0	1	1	0.0	0.0

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

Dollar Volume of Loans* (000's)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Dallas MSA	\$57,835	\$88,600	\$0	\$118,283	\$264,718	99.1	100.0
Statewide	\$0	\$0	\$0	\$2,500	\$2,500	0.9	0.0

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

According to the June 30, 2019, FDIC Deposit Market Share Report, UMB had \$267.4 million in deposits in the Dallas MSA. UMB had a 0.1 percent deposit market share. The bank's deposit market share ranked 56th out of 148 deposit-taking institutions. The bank's deposit market share ranked in the top 37.8 percent in the AA.

According to 2018 peer mortgage data, the bank had a 0.02 percent market share of home mortgage loan originations in the Dallas MSA. The bank's market share of home mortgage loan originations is well below the bank's deposit market share. The bank's market share of home mortgage loan originations ranked 348th out of 965 home mortgage lenders. The bank's market share of home mortgage loan originations ranked in the top 36.1 percent in the AA. The bank's market share ranking of home mortgage loan originations approximates their deposit market share ranking.

According to 2018 peer small business data, the bank had a 0.1 percent market share of small business loan originations. The bank's market share of small business loan originations approximates the bank's deposit market share. The bank ranks 72nd out of 250 small business lenders originating small business loans. The bank's market share ranking of small business loan originations is in the top 28.8 percent in the AA. The bank's market share ranking of small business loan originations is stronger than their deposit market share ranking. The bank's market share of small business loan volume is 0.6 percent. The bank's market share of small business loan volume is stronger than their deposit market share. The bank's market share ranking of small business loan volume ranked 47th out of 250 small business lenders. The bank's market share ranking of small business loan volume was in the top 18.8 percent in the AA. The bank's market share ranking of small business loan volume was stronger than their deposit market share ranking.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Table O 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 and purchases.

The geographic distribution of home mortgage loans is good. The percentage of loans in low-income tracts exceeds both the aggregate industry distribution of loans and the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income tracts is below the aggregate industry distribution of loans and is significantly below percentage of owner-occupied units in these geographies.

Small Loans to Businesses

Refer to Table Q in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is good. Lending opportunities in low-income geographies are limited with less than eight percent of both businesses and aggregate industry lending in these tracts.

The percentage of loans in low-income tracts is significantly below both the aggregate industry distribution of loans and the percentage of businesses in these geographies. The percentage of loans in moderate-income tracts exceeds both the aggregate industry distribution of loans and the percentage of businesses in those geographies.

Lending Gap Analysis

We reviewed supervisory data and other summary reports. We did not identify any unexplained conspicuous gaps in the bank's lending.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table P 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 borrower distribution of home mortgage loans is very poor.

The bank did not make any loans to low-income borrowers. The percentage of loans to moderate-income borrowers is significantly below the aggregate industry distribution of loans to these borrowers and the percentage of LMI families in the AA, respectively.

Small Loans to Businesses

Refer to Table R 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 adequate. The percentage of loans to businesses with gross annual revenues of \$1 million or less is near to the aggregate distribution of loans to these businesses and is significantly below the percentage of small businesses.

Community Development Lending

The institution is a leader in making CD loans in the Dallas MSA. CD lending had a significantly positive impact of the bank's Lending Test Rating in Texas.

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

During the evaluation period, the bank originated six qualified CD loans, for a total of \$118.3 million. This volume represented 169.1 percent of allocated tier 1 capital. UMB's CD loans demonstrated excellent responsiveness to AA needs, and concentrated on revitalization and stabilization efforts and community services.

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

- An \$88.8 million loan to construct a distribution warehouse facility in a low-income CT located in an Enterprise Zone. The distribution warehouse will create 300 new LMI full-time jobs.

- Two loans totaling \$15.0 million to an agency providing critical mental and healthcare services and social services to LMI individuals. A majority of recipients are Medicaid beneficiaries.

Texas – Statewide

CD lending in the state of Texas is adequate and had a neutral impact on the lending performance in the state of Texas. UMB made one loan for \$2.5 million that serves the state of Texas with no purpose, mandate, or function to serve the bank’s AA in Texas. The loan had a CD purpose for economic development.

Product Innovation and Flexibility

The institution makes little use of innovative and/or flexible lending practices in order to serve AA credit needs.

INVESTMENT TEST

The bank’s performance under the Investment Test in the state of Texas is Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

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

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

The institution exhibits adequate responsiveness to credit and community economic development needs. The institution does not use innovative and/or complex investments to support CD initiatives.

Qualified Investments and Grants										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000’s)	#	\$(000’s)	#	% of Total #	\$(000’s)	% of Total \$	#	\$(000’s)
Dallas MSA	3	\$1,723	18	\$1,101	21	100.0	\$2,824	100.0	0	\$0

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

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

UMB had 21 investments and grants totaling approximately \$2.8 million. This includes three prior period investments totaling \$1.7 million and one current period investment equaling \$1.0 million. Additionally, 17 grants totaling \$101 thousand were also made for a total CD investment and grants of \$2.8 million. CD investments and grants were equivalent to 4.0 percent of allocated tier 1 capital.

The bank’s qualified CD investments in the AA included a bond for \$1.0 million for the construction, renovation, acquisition, and equipment of school facilities in a school district within the AA. The school district is comprised of 31 schools where the majority of students are eligible for free or reduced lunches. Additionally, UMB provided a grant for \$15 thousand to an organization that supports a

nationally recognized program that promotes the musical talents of underrepresented students by providing them with free private lessons and by supporting their progress with mentoring, performance opportunities, concert attendance, and instrument loans. This grant was targeted to four schools where the majority of students are eligible for free or reduced lunches.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
		% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography			
	Low				Mod	Mid	Upp	N/A	Low	Mod	Mid	Upp	N/A
Dallas MSA	100.0	5	100.0	20.0	0.0	40.0	20.0	20.0	11.7	26.1	25.7	33.5	0.6

UMB operates five branches and three deposit-taking ATMs in the Dallas MSA. UMB has one branch in a low-income geography. The percentage of UMB’s branches in low-income geographies exceeds the percentage of population residing in these geographies. There are no branches in moderate-income geographies. There are no deposit-taking ATMs in LMI geographies.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	N/A
Dallas MSA	0	2	0	0	-1	-1	0

*Indicates a branch opened and closed for zero net change in census tract

To the extent changes have been made, the institution’s opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank closed two branches throughout the evaluation period. There was a branch

closure in a middle- and upper-income geography. A bank analysis indicated closure of the branches would enable the bank to achieve operational savings and service their customers in nearby branches.

Services, including where appropriate, business hours, do not vary in a way the inconveniences its AA, particularly LMI geographies and/or individuals.

Refer to the Scope of Evaluation section for information about alternative delivery systems. We did not place significant weight on these alternative delivery systems, as the bank did not maintain metrics to determine their effectiveness in helping meet the needs of LMI individuals or small businesses.

Community Development Services

The institution provides a relatively high level of CD services.

CD services in the Dallas/Fort Worth MSA include eight individuals participating in 18 activities, performing 293 hours of CD service-related activities at six organizations.

In the Dallas/Fort Worth MSA, five employees provided their expertise in a non-leadership role for a total of 87 hours. Three other employees served either as directors, committee members, or officers to CD organizations for a total of 206 hours. The following is an example of the CD services provided in the AA:

- During the evaluation period, one employee served as a board member for an organization that has a stay-in-school program, which provided community services for LMI students in the AA, for a total of 104 hours.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “Full-Scope,” and those that received a less comprehensive review, designated by the term “Limited-Scope”.

Time Period Reviewed:	January 1, 2017 through December 31, 2019	
Bank Products Reviewed:	Home mortgage, small business loans, small farm loans CD loans, CD investments, CD services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
UMB Capital Corporation	UMB Subsidiary	Qualified Investments
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		Counties
Kansas City MMSA	Full-Scope	(KS) Johnson, Wyandotte; (MO) Cass, Clay, Jackson, Platte
St. Louis MMSA	Full-Scope	(MO) St. Louis City, St. Louis, St. Charles, Jefferson; (IL) Madison, St. Claire
States		Counties
Arizona		
Phoenix-Mesa-Chandler MSA	Full-Scope	Maricopa
Colorado		
Denver-Aurora-Lakewood MSA	Full-Scope	Adams, Arapahoe, Denver, Douglas, Jefferson
Colorado Springs MSA	Full-Scope	El Paso
Kansas		
Lawrence MSA	Limited-Scope	Douglas
Manhattan MSA	Full-Scope	Riley
Topeka MSA	Full-Scope	Shawnee
Wichita MSA	Full-Scope	Sedgwick
Kansas Non-MSA	Limited-Scope	Atchison, Bourbon, Dickinson, Russell, Saline
Missouri		
Columbia MSA	Limited-Scope	Boone, Cooper
Jefferson City MSA	Limited-Scope	Cole
Joplin-Carthage MSA	Full-Scope	Jasper, Newton
Springfield MSA	Full-Scope	Christian, Greene
St. Joseph MSA	Full-Scope	Buchanan
Missouri Non MSA	Limited-Scope	Barry, Benton, Henry, Lawrence, Linn, Pettis, Johnson, Sullivan
Nebraska		
Omaha-Council Bluffs MSA	Full-Scope	Douglas
Oklahoma		
Oklahoma City MSA	Full-Scope	Oklahoma
Tulsa MSA	Full-Scope	Tulsa
Texas		
Dallas-Fort Worth-Arlington MSA	Full-Scope	Collin, Dallas, Denton, Tarrant

Appendix B: Summary of MMSA and State Ratings

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

(*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

Appendix C: Definitions and Common Abbreviations

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

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

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

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

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

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

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

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

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

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

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

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

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

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

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

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

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an

employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

MMSA (state): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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

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

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

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

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased loans are treated the same as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 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 O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-,

and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -
Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017-19**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
K.C. MMSA	2,049	331,197	100.0	70,044	6.2	4.0	3.0	17.5	13.9	15.9	38.1	33.2	38.3	38.0	48.9	42.7	0.2	0.1	0.2
Total	2,049	331,197	100.0	70,044	6.2	4.0	3.0	17.5	13.9	15.9	38.1	33.2	38.3	38.0	48.9	42.7	0.2	0.1	0.2

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data,
 Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-19**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
K.C. MMSA	2,049	331,197	100.0	70,044	21.2	9.0	8.1	17.3	16.0	19.6	20.2	17.6	21.8	41.2	48.9	35.3	0.0	8.5	15.2
Total	2,049	331,197	100.0	70,044	21.2	9.0	8.1	17.3	16.0	19.6	20.2	17.6	21.8	41.2	48.9	35.3	0.0	8.5	15.2

*Source: 2015 ACS Census ; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data,
Due to rounding, totals may not equal 100.0*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017-19**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
K.C. MMSA	1,541	421,024	100.0	35,549	7.1	9.7	6.8	18.5	16.5	17.0	34.3	28.4	32.0	38.0	41.0	41.6	2.1	4.3	2.6
Total	1,541	421,024	100.0	35,549	7.1	9.7	6.8	18.5	16.5	17.0	34.3	28.4	32.0	38.0	41.0	41.6	2.1	4.3	2.6

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data,
Due to rounding, totals may not equal 100.0*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017-19**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
K.C. MMSA	1,541	421,024	100.0	35,549	81.6	30.6	43.4	6.8	57.7	11.6	11.7
Total	1,541	421,024	100.0	35,549	81.6	30.6	43.4	6.8	57.7	11.6	11.7

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data,
Due to rounding, totals may not equal 100.0*

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2017-19**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
K.C. MMSA	21	3,450	100.0	415	4.3	0.0	0.7	15.5	0.0	5.1	41.8	66.7	64.6	38.1	33.3	29.6	0.3	0.0	0.0
Total	21	3,450	100.0	415	4.3	0.0	0.7	15.5	0.0	5.1	41.8	66.7	64.6	38.1	33.3	29.6	0.3	0.0	0.0

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data,
Due to rounding, totals may not equal 100.0*

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2017-19**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
K.C. MMSA	21	3,450	100.0	415	94.8	57.1	55.4	3.1	19.0	2.1	31.3
Total	21	3,450	100.0	415	94.8	57.1	55.4	3.1	19.0	2.1	31.3

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data
 Due to rounding, totals may not equal 100.0*

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017-19**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
St. Louis MMSA	663	133,854	100.0	85,131	5.7	1.1	2.0	17.6	8.3	13.9	38.0	27.8	39.8	38.7	62.9	44.1	0.1	0.0	0.1
Total	663	133,854	100.0	85,131	5.7	1.1	2.0	17.6	8.3	13.9	38.0	27.8	39.8	38.7	62.9	44.1	0.1	0.0	0.1

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data
Due to rounding, totals may not equal 100.0*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-19**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
St. Louis MMSA	663	133,854	100.0	85,131	21.7	8.6	8.6	16.9	15.1	18.1	19.6	14.3	19.2	41.8	58.2	34.6	0.0	3.8	19.5
Total	663	133,854	100.0	85,131	21.7	8.6	8.6	16.9	15.1	18.1	19.6	14.3	19.2	41.8	58.2	34.6	0.0	3.8	19.5

*Source: 2015 ACS Census ; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data
 Due to rounding, totals may not equal 100.0*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017-19**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
St. Louis MMSA	920	281,407	100.0	50,215	6.5	15.4	5.5	18.2	18.5	17.4	32.8	29.6	32.7	41.4	33.8	43.4	1.0	2.7	1.0
Total	920	281,407	100.0	50,215	6.5	15.4	5.5	18.2	18.5	17.4	32.8	29.6	32.7	41.4	33.8	43.4	1.0	2.7	1.0

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data
 Due to rounding, totals may not equal 100.0*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017-19**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
St. Louis MMSA	920	281,407	100.0	50,215	80.5	25.3	45.4	7.3	68.7	12.1	6.0
Total	920	281,407	100.0	50,215	80.5	25.3	45.4	7.3	68.7	12.1	6.0

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data
 Due to rounding, totals may not equal 100.0*

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017-19**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Phoenix MSA	392	126,835	100.0	190,706	4.6	2.0	4.0	18.8	11.2	15.8	34.7	20.9	35.5	41.9	65.8	44.1	0.0	0.0	0.6
Total	392	126,835	100.0	190,706	4.6	2.0	4.0	18.8	11.2	15.8	34.7	20.9	35.5	41.9	65.8	44.1	0.0	0.0	0.6

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data
 Due to rounding, totals may not equal 100.0*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-19**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Phoenix MSA	392	126,835	100.0	190,706	21.8	2.0	5.1	16.9	8.7	15.9	19.2	11.5	20.4	42.2	70.4	40.9	0.0	7.4	17.8
Total	392	126,835	100.0	190,706	21.8	2.0	5.1	16.9	8.7	15.9	19.2	11.5	20.4	42.2	70.4	40.9	0.0	7.4	17.8

*Source: 2015 ACS Census ; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data
 Due to rounding, totals may not equal 100.0*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017-19**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Phoenix MSA	389	123,829	100.0	104,551	6.6	10.0	6.9	16.3	19.5	16.5	28.3	26.0	26.8	48.3	43.2	49.3	0.6	1.3	0.6
Total	389	123,829	100.0	104,551	6.6	10.0	6.9	16.3	19.5	16.5	28.3	26.0	26.8	48.3	43.2	49.3	0.6	1.3	0.6

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data
 Due to rounding, totals may not equal 100.0*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017-19**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Phoenix MSA	389	123,829	100.0	104,551	87.7	26.7	46.2	4.3	66.1	7.9	7.2
Total	389	123,829	100.0	104,551	87.7	26.7	46.2	4.3	66.1	7.9	7.2

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data
 Due to rounding, totals may not equal 100.0*

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017-19

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Colorado Springs MSA	167	80,703	14.3	38,030	3.3	2.4	2.7	20.7	21.0	19.4	42.2	33.5	44.4	33.8	43.1	33.6	0.0	0.0	0.0
Denver MSA	1,000	269,417	85.7	148,478	4.8	2.6	5.0	19.4	8.7	20.0	33.7	22.7	33.6	42.1	66.0	41.4	0.0	0.0	0.0
Total	1,167	350,120	100.0	186,508	4.5	2.6	4.5	19.6	10.5	19.9	35.4	24.3	35.8	40.4	62.7	39.8	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data
 Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017-19

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Colorado Springs MSA	167	80,703	14.3	38,030	20.4	9.6	5.4	18.5	17.4	20.0	20.3	16.8	23.7	40.8	52.1	33.1	0.0	4.2	17.9
Denver MSA	1,000	269,417	85.7	148,478	21.6	1.6	6.1	17.5	6.8	18.7	20.4	13.1	23.1	40.5	75.5	36.7	0.0	3.0	15.4
Total	1,167	350,120	100.0	186,508	21.4	2.7	5.9	17.7	8.3	19.0	20.4	13.6	23.2	40.6	72.2	35.9	0.0	3.2	15.9

Source: 2015 ACS Census ; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data
 Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017-19**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Colorado Springs MSA	131	30,101	11.7	14,605	7.4	15.3	7.6	23.3	35.9	22.7	33.1	23.7	33.2	36.0	25.2	36.5	0.2	0.0	0.1
Denver MSA	992	228,298	270.3	78,923	6.8	12.4	8.2	18.7	45.5	19.3	31.5	20.9	29.9	42.7	21.2	42.3	0.4	0.1	0.4
Total	1,123	258,399	306.0	93,528	6.9	12.7	8.1	19.5	44.3	19.8	31.7	21.2	30.4	41.5	21.6	41.4	0.3	0.1	0.3

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017-19**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Colorado Springs MSA	131	30,101	11.7	14,605	88.7	27.5	52.5	3.4	61.8	7.9	10.7
Denver MSA	992	228,298	88.3	78,923	88.5	14.4	48.2	4.3	80.3	7.2	5.2
Total	1,123	258,399	100.0	93,528	88.5	15.9	48.9	4.1	78.2	7.3	5.9

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data
 Due to rounding, totals may not equal 100.0*

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017-19

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Kansas Non-MSA	162	12,597	57.4	1,760	0.0	0.0	0.0	17.0	8.6	15.6	54.2	63.0	54.5	28.8	28.4	29.9	0.0	0.0	0.0
Lawrence MSA	28	3,990	9.9	3,046	1.3	3.6	2.4	25.4	17.9	24.0	36.9	25.0	33.7	36.3	53.6	39.9	0.0	0.0	0.0
Manhattan MSA	23	6,615	8.2	1,525	0.0	0.0	0.0	3.5	8.7	9.1	48.4	65.2	58.6	47.5	26.1	31.1	0.7	0.0	1.2
Topeka MSA	32	2,385	11.3	4,584	4.6	3.1	1.7	15.3	6.3	12.1	39.1	34.4	41.8	41.0	56.3	44.4	0.0	0.0	0.0
Wichita MSA	37	8,317	13.1	15,139	5.8	0.0	3.4	19.6	8.1	16.1	29.0	24.3	33.7	45.6	67.6	46.9	0.0	0.0	0.0
Total	282	33,903	100.0	26,054	4.1	0.7	2.5	18.2	9.2	15.9	36.0	51.1	38.0	41.7	39.0	43.5	0.0	0.0	0.1

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017-19

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Kansas Non-MSA	162	12,597	91.5	1,760	19.7	13.0	8.4	17.3	20.4	18.8	22.3	22.2	22.8	40.6	42.0	28.8	0.0	2.5	21.3
Lawrence MSA	28	3,990	25.0	3,046	19.1	17.9	10.3	19.6	14.3	20.8	20.6	7.1	22.9	40.7	53.6	32.5	0.0	7.1	13.5
Manhattan MSA	23	6,615	35.4	1,525	22.5	21.7	5.2	18.2	17.4	15.0	19.2	8.7	19.0	40.1	34.8	38.5	0.0	17.4	22.3
Topeka MSA	32	2,385	30.5	4,584	20.8	3.1	10.2	17.2	34.4	20.5	21.8	25.0	22.3	40.3	37.5	31.0	0.0	0.0	16.0
Wichita MSA	37	8,317	35.2	15,139	21.7	5.4	8.4	17.7	8.1	19.7	20.9	8.1	20.7	39.8	73.0	31.2	0.0	5.4	20.0
Total	282	33,903	100.0	26,054	21.1	12.1	8.7	17.8	19.5	19.6	21.1	18.1	21.3	40.1	46.1	31.6	0.0	4.3	18.8

Source: 2015 ACS Census ; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017-19

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Kansas Non-MSA	101	23,117	29.6	1,068	0.0	0.0	0.0	27.9	18.8	22.8	46.9	64.4	51.4	25.2	16.8	25.8	0.0	0.0	0.0
Lawrence MSA	37	12,507	10.9	1,823	7.1	0.0	4.0	31.2	21.6	32.7	32.7	21.6	32.4	28.9	56.8	30.9	0.0	0.0	0.0
Manhattan MSA	21	2,553	8.9	668	0.0	0.0	0.0	20.0	42.9	19.8	60.9	33.3	56.7	18.0	9.5	22.9	1.1	14.3	0.6
Topeka MSA	36	12,108	15.6	1,989	17.0	16.7	11.7	18.9	47.2	18.8	39.4	30.6	43.2	24.8	5.6	26.3	0.0	0.0	0.0
Wichita MSA	146	47,174	42.8	7,393	7.3	5.5	7.9	27.6	26.7	25.8	31.4	41.1	32.3	33.7	26.7	34.0	0.0	0.0	0.0
Total	341	97,459	100.0	12,941	7.7	4.1	6.9	26.0	27.0	25.1	36.7	44.3	36.8	29.5	23.8	31.1	0.1	0.9	0.0

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017-19**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Kansas Non-MSA	101	23,117	29.6	1,068	74.1	38.6	40.9	7.6	48.5	18.4	12.9
Lawrence MSA	37	12,507	11.3	1,823	81.3	40.5	49.7	5.9	45.9	12.7	19.2
Manhattan MSA	21	2,553	7.2	668	76.9	52.4	47.8	6.5	38.1	16.6	28.6
Topeka MSA	36	12,108	12.3	1,989	75.1	17.4	40.9	8.0	86.1	16.9	7.7
Wichita MSA	146	47,174	42.8	7,393	78.3	26.7	40.9	8.3	67.8	13.4	5.5
Total	341	97,459	100.0	12,941	77.5	31.7	42.5	7.8	59.8	14.7	8.5

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data
 Due to rounding, totals may not equal 100.0*

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2017-19

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Kansas Non-MSA	197	37,447	91.6	467	0.0	0.0	0.0	5.8	0.0	0.4	72.2	88.8	88.2	22.0	11.2	11.3	0.0	0.0	0.0
Lawrence MSA	0	0	0.0	38	0.4	0.0	2.6	19.1	0.0	13.2	56.6	0.0	47.4	23.9	0.0	36.8	0.0	0.0	0.0
Manhattan MSA	12	1,985	5.6	41	0.0	0.0	0.0	4.7	0.0	7.3	85.8	100.0	82.9	9.5	0.0	9.8	0.0	0.0	0.0
Topeka MSA	1	200	1.0	17	3.6	0.0	0.0	8.7	0.0	0.0	26.2	0.0	11.8	61.5	100.0	88.2	0.0	0.0	0.0
Wichita MSA	5	1,352	6.5	118	3.3	0.0	0.0	14.6	0.0	0.8	25.9	40.0	17.8	56.2	60.0	81.4	0.0	0.0	0.0
Total	215	40,984	100.0	681	1.8	0.0	0.1	11.1	0.0	1.6	47.6	87.9	71.5	39.6	12.1	26.7	0.0	0.0	0.0

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data
 Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2017-19

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Kansas Non-MSA	197	37,447	91.6	467	97.7	80.2	60.8	1.4	10.7	0.9	9.1
Lawrence MSA	0	0	0.0	38	96.7	0.0	39.5	2.2	0.0	1.1	0.0
Manhattan MSA	12	1,985	7.1	41	92.3	71.4	36.6	3.0	58.3	4.7	0.0
Topeka MSA	1	200	1.0	17	96.8	100.0	41.2	2.6	0.0	0.6	0.0
Wichita MSA	5	1,352	6.5	118	96.6	100.0	50.8	1.9	0.0	1.5	0.0
Total	215	40,984	100.0	681	96.6	78.6	55.9	2.0	13.0	1.4	8.4

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data
 Due to rounding, totals may not equal 100.0

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017-19

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Columbia MSA	71	24,351	13.0	5,073	1.5	0.0	2.2	8.4	9.9	16.4	60.0	47.9	48.4	29.8	40.8	32.5	0.4	1.4	0.5
Jefferson City MSA	17	1,419	3.1	1,982	0.9	0.0	1.9	6.5	11.8	7.5	49.5	41.2	45.9	43.1	47.1	44.7	0.0	0.0	0.0
Joplin MSA	37	3,260	6.8	4,902	0.0	0.0	0.0	10.7	24.3	12.5	71.0	59.5	66.0	18.3	16.2	21.5	0.0	0.0	0.0
Missouri Non-MSA	211	18,098	38.6	5,731	0.6	0.0	0.5	6.1	18.0	5.9	72.6	56.9	67.7	20.7	25.1	25.9	0.0	0.0	0.0
Springfield MSA	126	81,850	23.0	13,662	2.7	4.8	2.6	12.8	9.5	11.9	58.7	46.8	61.5	25.7	38.1	23.9	0.0	0.8	0.1
St. Joseph MSA	85	11,142	15.5	1,957	0.9	1.2	0.6	22.8	22.4	20.1	48.9	43.5	49.3	27.4	32.9	30.1	0.0	0.0	0.0
Total	547	140,119	100.0	33,307	1.4	1.3	1.6	10.6	15.9	11.9	62.6	51.0	59.6	25.4	31.4	26.8	0.1	0.4	0.1

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-19**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Columbia MSA	71	24,351	17.2	5,073	20.5	7.0	9.2	17.0	14.1	19.4	21.6	19.7	20.3	40.9	42.3	31.1	0.0	16.9	20.0
Jefferson City MSA	17	1,419	5.0	1,982	17.1	11.8	14.2	16.2	17.6	23.2	24.0	35.3	21.5	42.8	35.3	24.3	0.0	0.0	16.9
Joplin MSA	37	3,260	10.8	4,902	19.9	13.5	7.3	18.3	18.9	18.5	21.2	13.5	20.7	40.6	48.6	32.8	0.0	5.4	20.7
Missouri Non-MSA	211	18,098	38.6	5,731	17.8	5.7	5.9	18.1	20.4	16.1	21.3	27.5	19.4	42.8	43.1	37.1	0.0	3.3	21.4
Springfield MSA	126	81,850	30.5	13,662	19.6	1.6	6.5	18.3	8.7	16.4	20.9	17.5	19.9	41.3	53.2	34.1	0.0	19.0	23.0
St. Joseph MSA	85	11,142	25.2	1,957	22.3	10.6	9.9	17.2	23.5	20.8	24.0	18.8	22.9	36.4	43.5	29.2	0.0	3.5	17.2
Total	547	140,119	100.0	33,307	19.4	6.4	7.6	17.8	17.2	17.8	21.6	22.1	20.3	41.2	45.5	33.1	0.0	8.8	21.2

Source: 2015 ACS Census ; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data,
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017-19

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Columbia MSA	58	11,537	25.0	3,181	10.0	10.3	9.9	18.9	27.6	15.7	35.5	39.7	39.4	28.5	19.0	31.0	7.1	3.4	4.0
Jefferson City MSA	37	15,205	27.0	1,157	15.6	24.3	13.9	15.7	5.4	12.5	26.7	5.4	29.8	42.1	64.9	43.7	0.0	0.0	0.0
Joplin MSA	27	5,732	27.6	2,377	0.0	0.0	0.0	19.0	18.5	17.1	67.6	77.8	68.7	13.4	3.7	14.2	0.0	0.0	0.0
Missouri Non-MSA	79	26,543	23.9	2,869	0.8	0.0	0.9	7.1	8.9	7.7	73.1	67.1	73.2	18.9	24.1	18.2	0.0	0.0	0.0
Springfield MSA	99	29,338	51.3	7,164	2.7	3.0	2.2	26.2	46.5	25.2	52.2	30.3	51.6	18.5	18.2	20.8	0.5	2.0	0.2
St. Joseph MSA	30	9,405	31.6	981	7.3	3.3	7.1	18.7	26.7	17.8	42.4	60.0	43.7	31.6	10.0	31.3	0.0	0.0	0.0
Total	330	97,760	100.0	17,729	4.6	5.8	4.1	19.0	25.5	18.4	52.5	44.5	53.3	22.5	23.0	23.4	1.4	1.2	0.8

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data,
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2017-19
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Columbia MSA	58	11,537	17.6	3,181	80.3	41.4	51.6	5.5	46.6	14.2	12.1	
Jefferson City MSA	37	15,205	12.8	1,157	75.0	13.5	50.0	6.8	81.1	18.1	6.7	
Joplin MSA	27	5,732	10.8	2,377	78.9	28.0	45.6	5.6	66.7	15.5	22.2	
Missouri Non-MSA	79	26,543	23.9	2,869	80.2	27.8	50.8	4.9	59.5	14.9	12.7	
Springfield MSA	99	29,338	30.0	7,164	81.4	21.2	46.9	6.6	70.7	12.0	8.1	
St. Joseph MSA	30	9,405	10.9	981	74.6	36.7	45.8	8.0	60.0	17.4	11.1	
Total	330	97,760	100.0	17,729	79.6	27.3	48.3	6.1	63.6	14.3	9.1	
<i>Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data. Due to rounding, totals may not equal 100.0</i>												

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2017-19

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Columbia MSA	26	3,912	11.1	242	1.2	0.0	0.8	11.0	0.0	4.1	59.7	65.4	64.1	27.2	34.6	30.6	0.9	0.0	0.4
Jefferson City MSA	0	0	0.0	73	3.0	0.0	0.0	4.7	0.0	1.4	47.2	0.0	54.8	45.1	0.0	43.8	0.0	0.0	0.0
Joplin MSA	2	65	2.5	208	0.0	0.0	0.0	6.2	100.0	1.4	86.1	100.0	95.2	7.8	0.0	3.4	0.0	0.0	0.0
Missouri Non-MSA	204	38,966	87.2	1,053	0.1	0.5	0.1	2.3	13.2	3.5	75.4	61.3	74.5	22.2	25.0	21.8	0.0	0.0	0.0
Springfield MSA	0	0	0.0	258	2.0	0.0	0.8	12.0	0.0	3.9	65.2	0.0	80.6	20.7	0.0	14.7	0.1	0.0	0.0
St. Joseph MSA	0	0	0.0	41	0.6	0.0	0.0	6.2	0.0	2.4	64.6	0.0	65.9	28.7	0.0	31.7	0.0	0.0	0.0
Total	234	42,993	100.0	1,875	0.9	0.4	0.3	7.0	12.4	3.3	69.2	61.5	75.4	22.8	25.6	21.0	0.2	0.0	0.1

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data,
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2017-19

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Columbia MSA	26	3,912	13.3	242	95.5	76.9	61.6	1.2	18.2	3.3	16.7
Jefferson City MSA	0	0	0.0	73	96.2	0.0	52.1	1.7	0.0	2.1	0.0
Joplin MSA	4	115	2.5	208	98.2	0.0	72.1	0.9	75.0	0.9	50.0
Missouri Non-MSA	204	38,966	87.2	1,053	97.7	80.4	71.1	0.6	8.3	1.7	11.3
Springfield MSA	0	0	0.0	258	97.7	0.0	76.4	0.9	0.0	1.5	0.0
St. Joseph MSA	0	0	0.0	41	97.8	0.0	43.9	1.1	0.0	1.1	0.0
Total	234	42,993	100.0	1,875	97.3	78.6	69.4	0.9	9.4	1.8	12.0

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data,
Due to rounding, totals may not equal 100.0

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017-19**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Omaha MSA	27	29,075	100.0	19,544	7.6	3.7	5.8	21.8	7.4	19.6	37.0	33.3	35.6	33.5	55.6	39.0	0.0	0.0	0.0
Total	27	29,075	100.0	19,544	7.6	3.7	5.8	21.8	7.4	19.6	37.0	33.3	35.6	33.5	55.6	39.0	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-19**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Omaha MSA	27	29,075	540.0	19,544	23.0	7.4	9.3	17.8	7.4	20.7	19.7	14.8	20.3	39.5	66.7	32.5	0.0	3.7	17.3
Total	27	29,075	540.0	19,544	23.0	7.4	9.3	17.8	7.4	20.7	19.7	14.8	20.3	39.5	66.7	32.5	0.0	3.7	17.3

*Source: 2015 ACS Census ; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data,
Due to rounding, totals may not equal 100.0*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017-19**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Omaha MSA	47	11,387	261.1	10,106	8.0	2.1	7.3	18.1	27.7	15.9	43.9	46.8	42.5	30.0	23.4	34.2	0.0	0.0	0.0
Total	47	11,387	261.1	10,106	8.0	2.1	7.3	18.1	27.7	15.9	43.9	46.8	42.5	30.0	23.4	34.2	0.0	0.0	0.0

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data,
Due to rounding, totals may not equal 100.0*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017-19**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Omaha MSA	47	11,387	100.0	10,106	79.5	27.7	47.1	8.1	61.7	12.3	14.3
Total	47	11,387	100.0	10,106	79.5	27.7	47.1	8.1	61.7	12.3	14.3

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data,
Due to rounding, totals may not equal 100.0*

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017-19**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Oklahoma City MSA	101	14,973	80.8	22,033	6.1	5.9	3.4	25.8	14.9	20.6	32.5	28.7	32.1	35.4	48.5	43.6	0.1	2.0	0.3
Tulsa MSA	24	4,803	19.2	17,866	4.5	0.0	1.6	20.5	12.5	14.6	32.9	25.0	34.8	42.1	62.5	49.0	0.0	0.0	0.0
Total	125	19,776	100.0	39,899	5.4	4.8	2.6	23.4	14.4	17.9	32.7	28.0	33.3	38.5	51.2	46.0	0.1	1.6	0.1

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data,
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-19**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Oklahoma City MSA	101	14,973	140.3	22,033	24.7	13.9	6.7	17.9	15.8	16.3	19.1	17.8	16.8	38.3	45.5	32.6	0.0	6.9	27.6
Tulsa MSA	24	4,803	45.3	17,866	22.0	4.2	5.9	16.9	25.0	15.7	19.6	29.2	17.7	41.4	33.3	36.5	0.0	8.3	24.1
Total	125	19,776	100.0	39,899	23.4	12.0	6.4	17.4	17.6	16.1	19.4	20.0	17.2	39.8	43.2	34.4	0.0	7.2	26.0

Source: 2015 ACS Census ; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data,
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017-19

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Oklahoma City MSA	133	36,098	233.3	14,143	6.6	12.8	7.0	26.2	19.5	24.8	30.5	17.3	29.6	32.3	48.9	34.9	4.5	1.5	3.7
Tulsa MSA	53	16,715	41.1	12,290	4.0	9.4	3.5	22.5	43.4	21.3	34.4	18.9	33.7	39.1	28.3	41.4	0.0	0.0	0.0
Total	186	52,813	326.3	26,433	5.3	11.8	5.4	24.4	26.3	23.2	32.4	17.7	31.5	35.6	43.0	37.9	2.3	1.1	2.0

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data
 Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017-19**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Oklahoma City MSA	133	36,098	71.5	14,143	82.9	27.1	44.5	6.3	54.9	10.8	18.0
Tulsa MSA	53	16,715	31.0	12,290	84.1	22.6	41.2	6.2	66.0	9.7	15.0
Total	186	52,813	100.0	26,433	83.5	25.8	43.0	6.2	58.1	10.3	16.1

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data,
Due to rounding, totals may not equal 100.0*

Texas

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017-19

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Dallas MSA	123	57,835	100.0	197,915	5.5	8.1	3.4	20.2	10.6	14.2	28.7	20.3	30.3	45.5	61.0	52.0	0.1	0.0	0.1
Total	123	57,835	100.0	197,915	5.5	8.1	3.4	20.2	10.6	14.2	28.7	20.3	30.3	45.5	61.0	52.0	0.1	0.0	0.1

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data
 Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-19**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Dallas MSA	123	57,835	129.5	197,915	23.8	0.0	4.0	16.4	4.9	13.1	17.9	7.3	19.5	42.0	62.6	45.7	0.0	25.2	17.6
Total	123	57,835	129.5	197,915	23.8	0.0	4.0	16.4	4.9	13.1	17.9	7.3	19.5	42.0	62.6	45.7	0.0	25.2	17.6

*Source: 2015 ACS Census ; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data
 Due to rounding, totals may not equal 100.0*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017-19**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Dallas MSA	260	88,600	158.5	154,275	7.4	3.5	7.3	19.4	31.5	19.5	26.0	19.2	24.2	46.5	44.2	48.1	0.7	1.5	0.8
Total	260	88,600	158.5	154,275	7.4	3.5	7.3	19.4	31.5	19.5	26.0	19.2	24.2	46.5	44.2	48.1	0.7	1.5	0.8

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data
 Due to rounding, totals may not equal 100.0*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017-19**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Dallas MSA	260	88,600	100.0	154,275	85.7	35.8	42.3	5.1	49.6	9.2	14.6
Total	260	88,600	100.0	154,275	85.7	35.8	42.3	5.1	49.6	9.2	14.6

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data
 Due to rounding, totals may not equal 100.0*