



PUBLIC DISCLOSURE

July 10, 2017

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

North American Savings Bank, FSB
Charter Number 703927
12498 S US Highway 71
Grandview, MO 64030-1733

Office of the Comptroller of the Currency
7101 College Boulevard, Suite 1600
Overland Park, KS 66210

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

Table of Contents

OVERALL CRA RATING	1
DEFINITIONS AND COMMON ABBREVIATIONS	2
DESCRIPTION OF INSTITUTION.....	6
SCOPE OF THE EVALUATION	7
DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW	8
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS	9
LENDING TEST	9
INVESTMENT TEST	12
SERVICE TEST	13
APPENDIX A: SCOPE OF EXAMINATION.....	Appendix A-1
APPENDIX B: COMMUNITY PROFILES FOR FULL-SCOPE AREAS	Appendix B-1
APPENDIX C: TABLES OF PERFORMANCE DATA.....	Appendix C-1

Overall CRA Rating

Institution's CRA Rating: Satisfactory.

The following table indicates the performance level of **North American Savings Bank, FSB (NASB, or the institution)** with respect to the Lending, Investment, and Service Tests:

Performance Levels	North American Savings Bank, FSB Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			X
High Satisfactory	X		
Low Satisfactory		X	
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- Lending inside its assessment areas is adequate as a non-traditional thrift that conducts the substantial majority of its retail lending activity through the Internet to reach nationwide markets;
- Lending activity is excellent;
- Flexible loan programs that are available in all bank assessment areas (AA), had a positive impact on the lending performance;
- The overall geographic distribution of loans is adequate;
- The overall borrower distribution of loans is adequate;
- Community development lending is excellent overall and had a positive impact on the lending performance;
- Overall investment performance is adequate; and,
- Service delivery systems are readily accessible to geographies and individuals of different income levels in the assessment areas. The accessibility of branches improved during the evaluation period due to the acquisition of another institution.

Definitions and Common Abbreviations

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

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

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

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

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

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

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

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

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

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

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

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

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

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

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

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

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

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

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

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

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

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

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

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

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

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) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

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

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

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

Description of Institution

NASB is a \$1.9 billion intrastate financial institution headquartered in Grandview, Missouri. The institution is a wholly owned subsidiary of NASB Financial, Inc., a one-bank holding company also headquartered in Grandview, Missouri. NASB is a non-traditional thrift that conducts the substantial majority of its retail lending activity through the Internet to reach nationwide markets. The institution also has three loan production offices in the Kansas City MA.

NASB is a full-service savings institution that offers both retail and commercial banking services with a primary focus in the residential real estate market. The institution's lending focus is on home purchase, home refinance, and Veteran Administration (VA) loans. Other product/service offerings include foreclosure prevention programs, free checking accounts, and access to electronic banking services such as mobile banking. NASB made loans under three flexible loan programs that are available in all bank AAs, which had an overall positive impact on the lending performance.

- NASB's Good Neighbor Loan Program provides affordable loan terms to applicants in low- and moderate-income (LMI) census tracts or with a household income that does not exceed 80 percent of MFI. Applicants can qualify with a lower minimum credit score than traditionally required, lender fees are waived, and a lender credit is provided for closing cost assistance. During the evaluation period, NASB originated 22 loans totaling \$2 million in the AAs.
- NASB's Good Neighbor Discount Program is a program through which customers can receive the benefits of the Good Neighbor Loan Program utilizing other loan products. It is available on purchase or refinance transactions for properties located in LMI census tracts. Lender fees are waived and a lender credit is provided for closing cost assistance. During the evaluation period, NASB provided waived fees and pricing discounts totaling \$398 thousand on 305 loans.
- NASB participates in the Missouri Housing Development Commission (MHDC) loan program. This program allows assistance with down payments and closing costs for first-time homebuyers, borrowers in LMI census tracts, and qualifying veterans. During the evaluation period, NASB originated 166 loans (out of a total of 191 loans within the AAs) totaling \$16.9 million to either persons with a total income below 80 percent of MFI and/or in LMI tracts.

As of December 31, 2016, NASB's loan portfolio, by dollar volume, consisted of 74 percent residential real estate, 25 percent commercial loans (including commercial real estate), and one percent other miscellaneous loans. Net loans represented 82 percent of total assets. Net tier one capital was \$219 million.

NASB operates 11 full-service branches and 11 deposit-taking Automated Teller Machines (ATMs) in Missouri. Ten branches are in the Kansas City MA, and one branch is located in the St Joseph MA. The Kansas City MA is part of a multi-state MSA that includes the state of Kansas. During the evaluation period, NASB acquired B&L Bank, Lexington, Missouri. The purchased institution had total assets of \$120 million and two branches in Lafayette County,

which is within the Kansas City MA. The merger occurred in July 2016 and performance since the acquisition is reflected in this evaluation as branches are within an existing AA.

There are no known legal, financial, or other factors impeding the institution's ability to help meet the credit needs in its assessment areas. NASB received a "Satisfactory" rating at its last CRA evaluation dated January 7, 2013.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We analyzed home purchase, home improvement, and home refinance mortgage loans reported under the HMDA for the period January 1, 2013 through December 31, 2016. Multifamily, small business, and small farm loans are not a primary product; therefore, we did not evaluate these products. Primary loan products for this review are products in which the institution originated at least 20 loans within the AA during the evaluation period. We reviewed community development loans, investments, and services for the period January 8, 2013 through July 10, 2017.

Data Integrity

We performed data integrity examinations to verify the accuracy of HMDA and CRA lending data. We also reviewed the appropriateness of community development (CD) activities provided for consideration in our evaluation. This included testing of CD loans, investments, and services for accuracy and to determine if they qualify as CD as defined in the CRA regulation.

Selection of Areas for Full-Scope Review

We performed a full-scope review of the Kansas City MO-KS MSA AA (Kansas City AA). The St. Joseph AA received a limited-scope review. The Kansas City AA represents 88.8 percent of the deposits, 90.9 percent of the branches, and 98.8 percent of CRA reportable loans in Missouri. Refer to Appendix A for more information on the Missouri AAs.

Ratings

The Bank's overall rating is based primarily on results in the area that received a full scope review. Therefore, ratings are based on CRA performance in the Kansas City AA. Lending test performance is based on the institution's distribution of home mortgage loans. Within the home mortgage loan category, significantly greater weight was placed on home purchase loans followed by home refinance loans. Home improvement loans received substantially less weight and they are not a major component of NASB's lending strategy. Home loans are the institution's primary loan product and affordable housing is an identified credit need.

Inside/Outside Ratio

The inside/outside ratio is an institution-wide calculation, and is not calculated by individual rating area or AA. The analysis is limited to NASB's originations and purchases, and does not include affiliate data.

When considering NASB's business strategy to originate and purchase home mortgage loans from across the country, the institution's performance is adequate overall. The total number of loans originated and purchased inside the institution's AAs is 13.3 percent. By loan type, the number of loans made inside the AAs are as follows: home purchase (23.3 percent), home refinance (6.6 percent), and home improvement (5.5 percent). During 2014-2016, NASB made a strategic effort to increase lending through the Internet. The institution also began a loan program in 2014 where purchased loans did not consider geography.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 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 AA 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 has engaged in discriminatory or other illegal credit practices.

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

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

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

Lending Activity

NASB's overall lending activity in Missouri is excellent. The institution's performance in home mortgage lending is excellent considering the strong competition in this AA.

Refer to Table 1 Lending Volume in Appendix C for the facts and data used to evaluate the bank's lending activity.

NASB's lending activity in the Kansas City AA is excellent. For home purchase and refinance loans, there are 514 and 424 lenders in the AA, respectively, reflecting strong competition. Based on the FDIC Deposit Market Share data as of June 30, 2016, NASB achieved a 2.02 percent market share of deposits, ranking ninth among 112 depository institutions. Based upon 2015 Peer Data, NASB ranked 16th in home purchase lending with a market share of 1.49 percent, and 32nd in home refinance lending with a market share of 0.64 percent. For home improvement loans, NASB ranks 12th among 203 reporting lenders with a 1.76 percent market share. These market ranks/shares are excellent when considering competition within the AA that comes from lenders without a depository presence. Several key lenders, including Primelending, Truhome Solutions LLC, and Quicken Loans, do not have a deposit presence in this AA. In addition, a majority of lenders with a larger market share than NASB are nationwide lenders with total assets over \$10 billion. The top five lenders for each respective home loan product in this AA originated 27.3 percent of home purchase loans, 35.2 percent of home improvement loans, and 27.4 percent of refinance loans. For home purchase loans, NASB ranks within the top five percent of lenders in the market. Bank rankings for home improvement and refinance loans are within the top 10 percent, respectively, in the market.

Distribution of Loans by Income Level of the Geography

Overall, the geographic distribution of loans is adequate. Primary weight is given to NASB's performance compared to industry aggregate data.

Home Mortgage Loans

The overall geographic distribution of home mortgage loans is adequate.

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

Home Purchase Loans

NASB's geographic distribution of home purchase loans during the evaluation period was adequate. Overall performance in low-income geographies was good. The percentage of loans in low-income census tracts exceeds the aggregate industry distribution of loans in these tracts. The institution's performance of these loans was very poor compared to the number of owner-occupied units in these geographies. Overall performance in moderate-income geographies was adequate. The percentage of loans in moderate-income tracts was below the aggregate industry distribution of loans in these tracts. The institution's performance of these loans was poor compared to demographics.

Home Improvement Loans

NASB's geographic distribution of home improvement loans during the evaluation period was good. Overall performance in low-income geographies was good. The percentage of loans in low-income census tracts exceeds the aggregate industry distribution of loans in these tracts. The institution's performance of these loans was poor compared to the number of owner-occupied units in these geographies. Overall performance in moderate-income geographies was excellent. The percentage of loans in moderate-income tracts exceeds the aggregate industry distribution of loans in these tracts. The institution's percentage of these loans was near to demographics and performance was good.

Home Refinance Loans

NASB's geographic distribution of home refinance loans during the evaluation period was poor. Overall performance in low-income geographies was poor. The percentage of loans in low-income census tracts is significantly below the aggregate industry distribution of loans in these tracts and performance is poor. The institution's performance of these loans was very poor compared to the number of owner-occupied units in these geographies. Overall performance in moderate-income geographies was very poor. The percentage of loans in moderate-income tracts was significantly below the aggregate industry distribution of loans in these tracts and performance was very poor. The institution's percentage of these loans was significantly below demographics and performance was very poor.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

Overall, the borrower distribution of lending is adequate. Primary weight is given to NASB's performance compared to industry aggregate data.

Based on the median value of housing units in the AA, housing costs for LMI households are high, particularly for low-income individuals. Based on 2010 Census Data, the median housing cost is \$163,192. The maximum housing costs for low-income households is approximately \$67,500. The maximum housing costs for moderate-income households is approximately \$157,500. The median value of homes in low-, moderate-, and middle-income geographies is \$81,963, \$108,510, and \$151,827, respectively.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans is adequate.

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

Home Purchase Loans

The overall borrower distribution of home purchase loans was good. Overall performance to low-income borrowers was adequate. The percentage of loans to low-income borrowers was below the aggregate industry distribution of loans to these borrowers. The institution's percentage of these loans was also below the percentage of low-income families in the AA. Overall performance to moderate-income borrowers was good. The percentage of loans to moderate-income borrowers was near-to the aggregate industry distribution of loans to these borrowers. The institution's percentage of these loans exceeds demographics. We placed more weight on performance to moderate-income borrowers due to the high housing costs in the AA, particularly for low-income persons.

Home Improvement Loans

The overall borrower distribution of home improvement loans was poor. Overall performance to low-income borrowers was very poor. The percentage of loans to low-income borrowers was significantly below the aggregate industry distribution of loans to these borrowers and performance was very poor. The institution's percentage of these loans was also significantly below the percentage of low-income families in the AA and performance is very poor. Overall performance to moderate-income borrowers was adequate. The percentage of loans to moderate-income borrowers was below the aggregate industry distribution of loans to these borrowers. The institution's percentage of these loans is below demographics. Home improvement loans are not a major component of NASB's lending strategy.

Home Refinance Loans

The overall borrower distribution of home refinance loans is poor. Overall performance to low-income borrowers was poor. The percentage of loans to low-income borrowers was significantly below the aggregate industry distribution of loans to these borrowers and performance was poor. The institution's percentage of these loans was also significantly below the percentage of low-income families in the AA and performance was poor. Overall performance to moderate-income borrowers was adequate. The percentage of loans to moderate-income borrowers was below the aggregate industry distribution of loans to these borrowers. The institution's percentage of these loans is below demographics.

Community Development Lending

Community development lending activity is excellent overall. NASB had a positive level of CD loans in the Kansas City AA that were responsive to community needs. CD lending had a positive impact on the overall lending performance.

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

NASB's originated 25 loans totaling \$26.6 million in qualified CD loans in the Kansas City AA during the evaluation period. This volume represented 13.7 percent of allocated tier one capital. The institution's CD loans demonstrated good responsiveness to AA needs, and supported affordable housing initiatives for LMI individuals.

Specific examples of the affordable housing CD loans originated in the Kansas City AA during this period include:

- \$10 million loan to finance the purchase and rehabilitation of a 380-unit multi-family property in a low-income census tract;
- Six loans totaling \$7 million to a corporation that renovated a 442-unit multi-family apartment complex in a moderate-income census tract;
- Two loans totaling \$2.2 million to finance the purchase and rehabilitation of a 6-unit multi-family property in a moderate-income geography; and,
- \$2 million loan to finance the purchase and rehabilitation of a 164-unit multi-family property in a low-income census tract.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the St. Joseph AA is weaker than the bank's overall "High Satisfactory" performance under the lending test. NASB did not originate any CD loans in this AA. Performance in the St. Joseph AA did not have an impact on the overall rating.

Refer to Tables 1 through 10 in Appendix C for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

NASB's performance under the investment test is rated "Low Satisfactory." Based on full-scope reviews, the bank's performance in the Kansas City AA is adequate.

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

During the evaluation period, NASB made investments and grants in the Kansas City AA totaling \$6 million. All investments were made in the current period. This volume represented 3.07 percent of allocated tier one capital. The institution's qualified investments and grants demonstrated adequate responsiveness to AA needs. In 2017, NASB invested in three

mortgage-backed securities totaling \$4 million, which provided affordable housing. The institution also made donations to 30 different CD organizations totaling \$2 million. A majority of these organizations provide community services targeted to LMI individuals such as before and after school programs, scholarships for LMI students, and shelter for homeless persons.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the St. Joseph AA is weaker than the bank's overall "Low Satisfactory" performance under the investment test. The difference in performance is due to the level of investments. Performance in the St. Joseph AA did not have an impact on the overall rating.

Refer to Table 14 in Appendix C for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated "Outstanding" Based on our full-scope review, NASB's performance in the Kansas City AA is excellent.

Retail Banking Services

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

NASB's branch distribution is excellent. Branches are readily accessible to geographies and individuals of different income levels in the AA. The percentage of branches in both low- and moderate-income geographies exceeded the percentage of the population in these geographies. As of December 31, 2016, there was one branch in low-income geographies and four branches in moderate-income geographies. In addition, we considered the accessibility of branches near-to LMI geographies. Near-to branches are those located in middle-or upper-income geographies that are within one-half mile of a LMI geography. There were three branches near to moderate-income geographies.

Branch openings during the evaluation period had a positive effect on the accessibility of the institution's delivery systems to LMI geographies or individuals. The acquisition of B&L Bank in July 2016 resulted in NASB acquiring two branches. One branch was in a moderate-income tract and the other branch was in a middle-income tract in the Kansas City AA. The bank did not close any branches during the evaluation period. Branch services and hours did not vary in a way that would inconvenience portions of the AA, particularly LMI individuals.

NASB provides a variety of alternative delivery systems and products. The distribution of ATMs is excellent and readily accessible to low- and moderate-income geographies. Other products and services include online banking, bill-pay, and mobile banking. We did not place significant weight on these alternative delivery systems, as the bank did not maintain metrics to determine their effectiveness in helping to meet the needs of LMI individuals or LMI geographies.

Community Development Services

NASB's performance in providing CD services in the Kansas City AA is adequate. CD Services focused primarily on the provision of financial education to CD organizations. NASB employees provided these services to 21 different organizations totaling 110 hours during the evaluation period. Examples of CD services provided include:

- Financial education via home buyer workshops targeted to LMI individuals;
- Financial counseling targeted to LMI families; and,
- First-time Homebuyer's Workshop classes to LMI individuals that covered processes related to purchasing and financing a home.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the St. Joseph AA is weaker than the bank's overall "Outstanding" performance under the Service Test. There is only one branch in this AA, which is located in a middle-income census tract. Performance in the St. Joseph AA did not have an impact on the overall rating.

Refer to Table 15 in Appendix C for the facts and data that support these conclusions.

Appendix A: Scope of Examination

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

Time Period Reviewed	Lending Test (excludes CD Loans): 01/01/2013 to 12/31/2016 Investment and Service Tests and CD Loans: 01/08/2013 to 07/10/2017	
Financial Institution	Products Reviewed	
North American Savings Bank, FSB (NASB) Grandview, Missouri	Home Purchase, Home Improvement, and Home Refinance; Community Development loans, investments, and services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		No affiliate products reviewed.
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Kansas City AA	Full-Scope	Cass, Clay, Jackson, Lafayette, and Platte in Missouri; and Johnson and Wyandotte in Kansas.
St. Joseph AA	Limited-Scope	Buchanan County, Missouri

Appendix B: Community Profiles for Full-Scope Areas

Kansas City, MO-KS MSA

Demographic Information for Full Scope Area: NASB KC MO-KS MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	490	13.27	23.88	31.02	28.57	3.27
Population by Geography	1,819,962	8.46	22.31	35.42	33.80	0.01
Owner-Occupied Housing by Geography	483,866	5.40	19.06	37.58	37.96	0.00
Business by Geography	118,082	6.81	19.49	31.49	40.40	1.81
Farms by Geography	3,450	2.90	18.09	41.62	37.07	0.32
Family Distribution by Income Level	466,059	20.18	17.42	21.30	41.11	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	175,231	15.71	33.20	34.97	16.13	0.00
Median Family Income		68,846		Median Housing Value		162,379
FFIEC Adjusted Median Family Income for 2016		72,500		Unemployment Rate (2010 US Census)		3.64%
Households Below Poverty Level		11%				

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

Source: 2010 US Census and 2016 FFIEC updated MFI

NASB's Kansas City AA includes seven counties in the Kansas City MO-KS metropolitan statistical area (MSA): Cass, Clay, Jackson, Lafayette, and Platte in Missouri; and Johnson and Wyandotte in Kansas. NASB only has branches in the Missouri counties designated in the AA. While the bank has no Kansas branches, the counties of Johnson and Wyandotte are adjacent to Jackson County and part of the AA since approximately 23 percent of lending is in these counties during the evaluation period. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude any areas, particularly LMI geographies.

The AA includes Kansas City, which is the largest city in Missouri and the sixth largest in the Midwest. According to the U.S. Census Bureau, Kansas City is the 37th largest city by population in the United States. It is the anchor city of the Kansas City MA, which straddles the Kansas-Missouri border.

The updated median family income remained relatively stable over the evaluation period, from \$71,200 in 2013 to \$72,500 in 2016. LMI tracts are predominantly located in Jackson and Wyandotte counties. The Kansas City AA has 490 census tracts, which are designated 65 low-income, 117 moderate-income, 152 middle-income, and 140 upper-income. The remaining 16 tracts have no income designation. The percentage of households and families living below the poverty level are 10.6 percent and 8.1 percent, respectively.

Strong competition for financial services exists within the institution's AA, which includes nationwide and regional banks. According to the FDIC market share data as of June 30, 2016, there are 112 financial institutions operating in this market with 629 total banking offices. NASB ranks ninth in the market with a 2.0 percent deposit market share. Significant competitors include UMB Bank, Commerce Bank, Bank of America, U.S. Bank, and Capitol Federal Savings Bank. These top five institutions represent 56.6 percent of total deposits in the AA.

NASB's deposits in the AA total \$1 billion, representing 88.8 percent of total NASB deposits as of June 30, 2016. The majority of the institutions branches are in this AA. As of December 31, 2016, NASB has 10 full-service branches in the Kansas City AA. The institution supplements its branch network with 10 full-service ATMs.

Employment and Economic Factors

The economy of the Kansas City AA is expanding and among the Midwest's best performing large economies according to Moody's Analytics dated February 2017. According to the Bureau of Labor Statistics, the unemployment rate for the AA continues to decline. The rate was 6.2 percent for 2013, 5.6 percent for 2014, 4.8 percent for 2015, and 4.3 percent for 2016. The 2016 national unemployment rate is 4.9 percent.

The Kansas City AA is home to several major industries, including restaurants, hospitals, pharmaceutical, and employment services. The federal and state government also employs large numbers of workers. The top employers in the AA include Cerner Corporation, HCA Midwest Health System, St Luke's Health System, Ford Motor Co., the University of Kansas Hospital, Children's Mercy Hospital and Clinics, and Sprint Corp.

Housing

Based on reports from the Kansas City Regional Association of Realtors, existing home values increased 22.4 percent from \$134,751 in January 2013 to \$165,000 in December 2016. However, new home values declined 7.1 percent from \$365,000 in January 2013 to \$339,100 in December 2016.

There are very limited opportunities for residential mortgage lending in low-income geographies in the AA. Based on 2010 census data, 5.4 percent of owner-occupied units in the AA were located in low-income geographies. Within these low-income tracts, 45.3 percent were rental units and 21.5 were vacant.

Community Contact

Community contact information from a local housing authority was considered as part of this performance evaluation. Primary needs in the AA are affordable housing and home improvement loans, and increased participation with Community Development Financial Institutions to operate loan pools that provide credit to individuals that don't meet traditional credit standards.

Appendix C: Tables of Performance Data

Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/AA; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Tables without data are not included in this PE.

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/AA. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/AA. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multi-family Loans** - Compares the percentage distribution of the number of multi-family loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multi-family housing units throughout those geographies. The table

also presents market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's AA.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's AA.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/AA. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm.

Market share information is presented based on the most recent aggregate market data available.

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

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

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

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

Table 1. Lending Volume

LENDING VOLUME													Geography: MISSOURI		Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016	
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***				
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)					
Full Review:																
Kansas City AA	98.81	3,464	718,860	1	100	0	0	25	26,609	3,490	745,569	88.79				
Limited Review:																
St. Joseph AA	1.19	42	6,620	0	0	0	0	0	0	42	6,620	11.21				

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

** The evaluation period for Community Development Loans is from January 08, 2013 to July 10, 2017.

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

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: MISSOURI					Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016							
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Kansas City AA	2,464	99.04	5.40	2.23	19.06	10.31	37.58	34.70	37.96	52.76	1.62	13.50	37.36	47.52
Limited Review:														
St. Joseph AA	24	0.96	0.00	0.00	13.08	4.17	66.02	37.50	20.90	58.33	0.00	7.42	63.85	28.73

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

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area. There are census tracts in the MA/AA that contain no income data.

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT Geography: MISSOURI Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016														
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Kansas City AA	105	97.22	5.40	2.86	19.06	17.14	37.58	29.52	37.96	50.48	2.68	14.20	34.84	48.28
Limited Review:														
St. Joseph AA	3	2.78	0.00	0.00	13.08	0.00	66.02	66.67	20.90	33.33	0.00	12.06	67.38	20.57

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

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area. There are census tracts in the MA/AA that contain no income data.

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: MISSOURI					Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016							
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Kansas City AA	882	98.33	5.40	0.91	19.06	5.67	37.58	33.45	37.96	59.98	1.42	11.62	35.32	51.64
Limited Review:														
St. Joseph AA	15	1.67	0.00	0.00	13.08	0.00	66.02	53.33	20.90	46.67	0.00	9.56	66.16	24.28

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

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area. There are census tracts in the MA/AA that contain no income data.

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY														Geography: MISSOURI				Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016			
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*										
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Low	Mod	Mid	Upp							
Full Review:																					
Kansas City AA	12	100.00	15.38	16.67	31.31	50.00	29.37	33.33	23.94	0.00	25.11	33.79	26.48	14.61							
Limited Review:																					
St. Joseph AA	0	0.00	0.00	0.00	20.64	0.00	65.83	0.00	13.52	0.00	0.00	25.00	62.50	12.50							

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

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area. There are census tracts in the MA/AA that contain no income data.

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

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: MISSOURI				Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016								
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income [*]			
	#	% of Total ^{**}	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Kansas City AA	1	100.00	6.81	0.00	19.49	100.00	31.49	0.00	40.40	0.00	5.59	18.88	29.99	45.53
Limited Review:														
St. Joseph AA	0	0.00	0.00	0.00	19.39	0.00	62.34	0.00	18.27	0.00	0.00	18.87	59.92	21.21

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

^{**} Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area. There are census tracts in the MA/AA that contain no income data.

^{***} Source Data - Dun and Bradstreet (2016).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: MISSOURI					Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016							
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families***	% BANK Loans****	% Families ¹	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Kansas City AA	2,464	99.04	20.18	9.13	17.42	21.79	21.30	26.50	41.11	42.53	11.59	23.63	25.58	39.19
Limited Review:														
St. Joseph AA	24	0.96	19.79	12.50	19.02	33.33	23.02	25.00	38.16	29.17	12.20	32.64	24.61	30.55

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

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

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

**** As a percentage of loans with borrower income information available. No information was available for 1.8% of loans originated and purchased by BANK.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: MISSOURI					Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016							
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data [†]			
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ²	% BANK Loans ^{**}	% Families ^{***}	% BANK Loans ^{***}	% Families ^{***}	% BANK Loans ^{***}	Low	Mod	Mid	Upp
Full Review:														
Kansas City AA	106	97.25	20.18	2.27	17.42	12.50	21.30	34.09	41.11	51.14	8.52	17.64	25.39	48.45
Limited Review:														
St. Joseph AA	3	2.75	19.79	0.00	19.02	0.00	23.02	0.00	38.16	100.00	14.06	21.09	18.75	46.09

[†] Based on 2015 Peer Mortgage Data -- US and PR

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

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

^{****} As a percentage of loans with borrower income information available. No information was available for 16.5% of loans originated and purchased by BANK.

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: MISSOURI				Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016								
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data [*]			
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ³	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{**}	% Families ^{***}	% BANK Loans ^{****}	Low	Mod	Mid	Upp
Full Review:														
Kansas City AA	882	98.33	20.18	4.61	17.42	14.52	21.30	23.07	41.11	57.80	8.46	17.99	25.53	48.02
Limited Review:														
St. Joseph AA	15	1.67	19.79	0.00	19.02	26.67	23.02	13.33	38.16	60.00	9.52	22.33	24.47	43.68

^{*} Based on 2015 Peer Mortgage Data -- US and PR

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

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

^{****} As a percentage of loans with borrower income information available. No information was available for 16.2% of loans originated and purchased by BANK.

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: MISSOURI			Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Kansas City AA	1	100.00	81.49	100.00	100.00	0.00	0.00	30,700	13,980
Limited Review:									
St. Joseph AA	0	0.00	75.74	0.00	0.00	0.00	0.00	1,032	441

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

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

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

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

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
			Geography: MISSOURI		Evaluation Period: JANUARY 8, 2013 TO JULY 10, 2017				
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Kansas City AA	0	0	106	\$5,963	106	\$5,963	94.73	0	0
Limited Review:									
St. Joseph AA	0	0	9	\$332	9	\$332	5.27	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: MISSOURI Evaluation Period: JANUARY 8, 2013 TO JULY 10, 2017																	
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Kansas City AA	88.79	10	90.91	10.00	40.00	30.00	20.00	2	0	0	1	1	0	8.46	22.31	35.42	33.80
Limited Review:																	
St. Joseph AA	11.21	1	9.09	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	17.26	63.50	19.24