



PUBLIC DISCLOSURE

December 2, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Academy Bank, National Association
Charter Number: 15592

1201 Walnut Street, Suite 100
Kansas City, MO 64105

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.

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Overall CRA Rating

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

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

Performance Levels	Academy Bank, National Association Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		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:

- The Lending Test rating is based on performance in the Kansas City multistate metropolitan statistical area (MMSA) and the State of Colorado. The Kansas City MMSA has 58.9 percent of the deposits and 34.2 percent of the loans originated in bank assessment areas (AAs) and Colorado has 26.1 percent of the deposits and 38.8 percent of the loan originated in bank AAs and five different AAs.
- The Investment Test rating is based on performance in both the Kansas City MMSA and the Denver metropolitan statistical area (MSA). The dollar volume of current- and prior-period investments represented 3.6 percent of total tier 1 capital for the Kansas City MMSA and 3.4 percent in the Denver MSA.
- The Service Test rating is based on performance in both the Kansas City MMSA and the State of Colorado. The Kansas City MMSA has 58.9 percent of the deposits and 34.2 percent of the loans originated in bank AAs and Colorado has 26.1 percent of the deposits and 38.8 percent of the loan originated in bank AAs and five different AAs.

The OCC recognizes the Credit Builder Secured Credit Card Program (CBSCCP) as a non-innovative but flexible product. Academy offers CBSCCP to applicants with limited or no credit history or applicants looking to improve their credit history. Underwriting for this product does not consider a minimum credit score but focuses on the applicant’s ability to repay. If approved, the borrower establishes a Credit Builder Savings Account as collateral. Borrowers can increase the credit line in \$50 increments by depositing funds into their savings account. Credit limits range from \$300 to \$3000. The secured card has no application fee, no annual fee, and no over-the-limit fees. Borrowers may upgrade to an unsecured card with good performance. Academy Bank during the assessment period had the following amount of card holders by number and dollar in each area:

- Kansas City, MO-KS MMSA, 1,578 card holders with \$503 thousand in approved credit.

- State of Missouri, 1,009 card holders with \$217 thousand in approved credit.
- State of Colorado, 2,262 card holders with \$638 thousand in approved credit.
- State of Arizona, 774 card holders with \$162 thousand in approved credit.

In all assessment areas, Academy Bank has 5,623 card holders with \$1.5 million in approved credit.

Lending in Assessment Area

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

The bank originated and purchased 81.0 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

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	1,008	68.4	466	31.6	1,474	353,182	62.7	209,779	37.3	562,961
Small Business	1,300	76.7	396	23.3	1,696	203,703	72.7	76,444	27.3	280,147
Small Farm	3	50.0	3	50.0	6	720	50.1	716	49.9	1,436
Consumer	27,144	81.8	6,056	18.2	33,200	44,335	76.1	13,910	23.9	58,245
Total	29,455	81.0	6,921	19.0	36,376	601,940	66.7	300,849	33.3	902,789

Source: Bank Data
Due to rounding, totals may not equal 100.0%

Description of Institution

Academy has a \$2.6 billion asset profile as of December 31, 2023. Academy is a wholly owned subsidiary of Dickinson Financial Corporation (DFC), both are headquartered in Kansas City, Missouri. As of December 31, 2023, DFC had assets totaling \$3.9 billion. DFC operates one other national bank, Armed Forces Bank, National Association (AFB) headquartered in Fort Leavenworth, Kansas. Academy offers traditional loan and deposit products with a strategic focus on commercial lending. Academy operates in five AAs within the state of Colorado, five within the state of Missouri, and three within the state of Arizona. In addition, the Kansas City, MO-KS MMSA is one AA. The bank has a significant presence in Walmart branches in Missouri, Kansas, Arizona, and Colorado, which allows them to offer extended evening and weekend services. At the time of this evaluation, there are a total of 71 branches and 90 deposit-taking automated teller machines (ATMs). Academy opened two branches and closed 14 branches during the CRA evaluation period, four closed branches were in a low- or moderate-income census tract. These four closures included one in-store Walmart branch in Boulder, Colorado closed in 2022; one in-store Walmart branch in St. Louis, Missouri closed in 2022; and one in-store Walmart branch in Phoenix, Arizona closed in 2023. The fourth closure in a low- or moderate-income census tract was an interactive deposit-taking machine in Kansas City, Missouri that closed in 2022. Academy has partnered with the Global ATM network allowing customers to make deposits at over 50,000 ATMs and with cashiers at participating retail locations.

As of December 31, 2023, Academy had tier 1 capital of \$411.0 million. The loan portfolio accounts for 76.0 percent of total assets, primarily consisting of real estate loans and commercial loans. Real estate loans primarily consist of non-owner-occupied non-farm non-residential loans at \$857.1 million, or 43.0 percent of gross loans and 1-4 family residential real estate secured loans at \$272.8 million, or 13.8 percent of gross loans. Commercial loans total \$560.3 million, or 28.2 percent of gross loans. Consumer loans total \$25.5 million, or one percent of gross loans.

There are no legal, financial, or other factors impeding Academy's ability to meet credit needs in its communities. Academy received a satisfactory rating on the previous evaluation dated September 27, 2021, under the intermediate small bank test.

Coronavirus, Small Business Administration (SBA) Paycheck Protection Program (PPP) Participation

In early 2020, the coronavirus (COVID-19) pandemic led to a public health emergency that severely impacted the national economy. COVID-19 caused deteriorating economic conditions resulting from mandated stay-at-home orders and business shutdowns used to slow the spread of the virus. Academy responded to the needs of small businesses within its AAs by originating a significant volume of loans under the PPP. During 2021, Academy originated 1,020 PPP loans totaling \$85.4 million.

Banks were not required to collect revenue information as part of the underwriting process for PPP loans. In many cases, the bank was unable to collect borrower income information due to the exigent nature of the PPP lending program. The significant volume of PPP loans in the bank's AAs resulted in a very low percentage of small loans to small businesses compared to the percentage of small businesses and aggregate lending in the AAs. Consistent with Interagency guidance¹, we considered the unique circumstances affecting borrowers and banks resulting from the COVID-19 pandemic and did not penalize the bank for originating a large volume of loans without obtaining gross annual revenue information. When concluding on borrower income distribution of small loans to small businesses in 2021, the examiner considered the bank's responsiveness to the needs created by the COVID-19 pandemic resulting in the significant volume of small business loans without revenue information. Given the extraordinary circumstances and needs brought on by the COVID-19 pandemic and the bank's responsiveness to those needs by originating a significant volume of PPP loans, the examiners gave positive consideration to the bank's lending to small businesses in its rating areas and AAs.

Scope of the Evaluation

Evaluation Period/Products Evaluated

Examiners evaluated Academy's CRA performance under the Large Bank Lending, Investment, and Service Tests with an evaluation period from January 1, 2020, through December 31, 2023. Examiners evaluated home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA) and small loans to business reported under CRA. Academy opted to include consumer loans as they represent 91.3 percent of the portfolio by number.

Census data received an update from the 2020 Census beginning with the 2022 data; therefore, the 2021 lending data received a separate analysis from the 2022 through 2023 lending data. The greatest weight will be placed on the 2022-2023 data due to the greater number of loan originations. The census tracts changed from 2021 to 2022 due to the updated census data.

To perform a meaningful analysis for lending performance, a minimum of 20 loans were needed in a loan product during the evaluation period. Refer to Scope of Evaluation section under each Multistate Metropolitan Statistical Area (MMSA) and State Rating area section for details on loan products that did not have a sufficient volume to perform a quantitative analysis.

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, MMSA, or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the Scope section under each State Rating section for details regarding how full-scope AAs were selected. Refer to Appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

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

The greatest weight for ratings for the evaluation and analysis is placed on the 2022-2023 time period for the greater number of years. The greatest weight for analysis is also placed on performance in the Kansas City, MO-KS MMSA having 35.2 percent of the bank's total branches and 58.9 percent of the total branch deposits, the bank headquarters are located in the AA, 34.7 percent of total bank loans are in the AA by number, 66.5 percent of the loan dollar volume is located in the AA, and 42.2 percent of the deposit-taking ATMs.

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

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 Bureau of Consumer Financial Protection, 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, MO-KS MMSA

CRA rating for the Kansas City, MO-KS MMSA¹: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- The bank is a leader in community development loans.
- The distribution of loans in low- and moderate-income geographies in the AA is good.
- The distribution of loans among borrowers of different income levels and businesses of different sizes in the Kansas City, MO-KS AA is good.
- The branch distribution reasonably serves LMI geographies, and the amount of community development hours spent serving LMI geographies is outstanding.
- The bank had an adequate level of community development investments.

Description of Institution's Operations in Kansas City, MO-KS MMSA AA

The Kansas City, MO-KS AA includes a portion of the Kansas City MO-KS MMSA. The Kansas City, MO-KS AA is comprised of the entire counties of Cass, Clay, Jackson, Platte, and Ray counties in the state of Missouri and Johnson and Wyandotte counties in the state of Kansas. The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies.

Academy operated 25 total branches in this AA, representing 35.2 percent of its total branches. The bank also operated 38 deposit-taking ATMs in this AA, representing 42.2 percent of its total deposit-taking ATMs. Based on Table A (2022-2023) below, the AA has 56 low-income, 149 moderate-income, 208 middle-income, 148 upper-income, and 24 unclassified census tracts (CTs). Academy operated no branches and no deposit-taking ATMs in low-income CTs and six branches and six deposit-taking ATMs in moderate-income CTs in the Kansas City AA.

Based on the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report as of June 30, 2023, Academy's deposits in this AA totaled approximately \$1.2 billion, approximately 58.9 percent of Academy's total deposits. Deposit competition in the AA is strong. The FDIC Deposit Market Share Report as of June 30, 2023, indicated there are 83 institutions with 316 offices operating in the Kansas City AA, with additional competition from credit unions, financial advisors, and internet-banking organizations. Academy ranked 27th with a deposit market share of less than 1 percent in the Kansas City AA. The top three banks by deposit market share are Capitol Federal Savings Bank, CrossFirst Bank, and Bank of America.

The following tables provides a summary of the demographics that include housing, business, and farm information for the Kansas City AA.

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.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Kansas City, MO-KS MMSA – 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	487	16.0	22.2	31.2	26.7	3.9
Population by Geography	1,856,092	9.7	21.5	36.6	32.0	0.3
Housing Units by Geography	796,954	11.4	22.7	36.9	28.5	0.5
Owner-Occupied Units by Geography	470,955	6.1	17.6	38.7	37.4	0.2
Occupied Rental Units by Geography	253,958	16.9	30.4	35.7	16.4	0.7
Vacant Units by Geography	72,041	27.1	28.7	29.1	13.2	1.9
Businesses by Geography	167,504	7.3	18.7	33.6	38.4	1.9
Farms by Geography	4,561	5.2	16.3	41.2	37.0	0.4
Family Distribution by Income Level	467,826	21.3	17.4	20.2	41.1	0.0
Household Distribution by Income Level	724,913	23.5	16.6	17.6	42.2	0.0
Median Family Income MSA - 28140 Kansas City, MO-KS MSA		\$72,623	Median Housing Value			\$163,248
Median Household Income: \$63,233			Median Gross Rent			\$859
Households Below Poverty Level: 12.0%			Families Below Poverty Level			9.2%
<i>Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Kansas City, MO-KS MMSA – 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	557	10.1	24.8	34.5	26.4	4.3
Population by Geography	1,987,347	7.3	24.0	37.3	30.8	0.7
Housing Units by Geography	832,308	8.1	25.6	37.6	27.8	0.9
Owner-Occupied Units by Geography	494,427	4.5	20.1	40.1	34.9	0.4
Occupied Rental Units by Geography	272,699	12.7	32.9	35.3	17.7	1.4
Vacant Units by Geography	65,182	16.6	36.2	28.2	16.7	2.3
Businesses by Geography	297,543	5.7	23.3	34.0	34.4	2.6
Farms by Geography	7,814	4.2	20.3	42.5	32.1	1.0
Family Distribution by Income Level	489,111	20.3	17.4	21.6	40.7	0.0
Household Distribution by Income Level	767,126	23.6	16.3	18.0	42.0	0.0
Median Family Income MSA - 28140 Kansas City, MO-KS MSA		\$86,562	Median Housing Value			\$204,108
Median Household Income: \$75,289			Median Gross Rent			\$1,005
Households Below Poverty Level: 9.7%			Families Below Poverty Level			6.9%
<i>Source: 2020 U.S. Census and 2023 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>						

Based on Table A (2022-2023), the Kansas City, MO-KS MMSA AA has a population of 2.0 million, which includes 767,126 households and 832,308 housing units, with 92.2 percent occupancy. The median housing value is \$204,108.

Examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the information in the above respective tables, low-income families earned less than \$36,312 (2021) or \$43,281 (2022-2023), and moderate-income families earned less than \$58,098 (2021) or \$69,250 (2022-2023). The median housing value in the AA is \$163,248 (2021) or \$204,108 (2022-2023). One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was between \$908 (2021) or \$1,082 (2022-2023) for a low-income borrower and \$1,452 (2021) or \$1,731 (2022-2023) for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$876 (2021) or \$1,096 (2022-2023). Based on these calculations, low-income borrowers would be challenged to qualify for and afford home mortgage financing in this AA.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For this AA, 9.2 percent (2021) and 6.9 percent (2022-2023) of families were living below the poverty level.

Employment and Economic Data

Kansas City is a major center for business, distribution, and transportation. Kansas City is a transportation hub with the Kansas City international airport and the intersections of Interstates 35 and 70 and U.S. Route 71. According to Moody's Analytics, Kansas City has strong population growth, employment growth, and increase in gross metro product trends. Increasing housing and rental prices are a major concern for the Kansas City MO-KS MMSA. The primary industries in the AA include professional and business services, education and health services, transportation and utilities, and government. Some of the major employers in the area include the federal government, Children's Mercy Hospital, Cerner Corporation, Honeywell, and Burns & McDonnell. Also, headquartered in the area is Russell Stover, Garmin International, Hallmark Cards, and Black & Veatch.

According to the U.S. Bureau of Labor Statistics, the unemployment rate for the Kansas City, MO-KS MMSA AA decreased from 4.9 percent in January 2021 to 2.9 percent in December 2023. The national unemployment rate was 3.7 percent as of December 2023.

Community Contacts

As part of the CRA evaluation, the OCC reviewed information from six community contacts within the Kansas City, MO-KS MMSA to better understand area credit and community needs. Contacts worked for organizations focused on economic development, affordable housing, and community services. In addition to monetary credit and investment needs, contacts expressed a need for banker involvement in community development services. Contacts cited a wide range of community needs, including affordable housing, small business lending, banker involvement on boards and committees, and first-time homebuyer education and assistance, specifically HUD-certified counselors.

Scope of Evaluation in Kansas City, MO-KS MMSA

For the purposes of this evaluation, examiners analyzed the seven counties in the MMSA that the bank considers to be a part of its AA, which includes: Johnson and Wyandotte Counties in Kansas and Cass, Clay, Jackson, Platte, and Ray Counties in Missouri.

Examiners placed more emphasis on consumer loans versus the bank's home mortgage and small business loans because consumer loans comprise of 85.5 percent of the bank's loans by number, excluding CD loans, originated or purchased during the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS CITY, MO-KS MMSA**LENDING TEST**

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

Based on a full-scope review, the bank's performance in the Kansas City, MO-KS MMSA 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	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
2021								
Kansas City, MO-KS MMSA	606	438	0	1	3,259	4,304	100.0	100.0
2022-2023								
Kansas City, MO-KS MMSA	216	211	3	12	5,360	5,779	100.0	100.0
TOTAL	822	649	3	13	8,620	10,083	100.0	100.0

Dollar Volume of Loans								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
2021								
Kansas City, MO-KS MMSA	186,567,485	47,394,000	0	100,000	6,437,000	240,498,485	100.0	100.0
2022-2023								
Kansas City, MO-KS MMSA	83,888,783	58,593,000	720,000	24,158,475	15,767,000	158,968,783	100.0	100.0
TOTAL	270,456,268	105,987,000	720,000	24,258,475	22,204,000	423,625,743	100.0	100.0
<i>Source: Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%</i>								

Academy Bank ranked 8th out of 50 depository institutions (top 4.2 percent) with a deposit market share of 1.5 percent. For home mortgage loans, the bank's market share of 0.2 percent ranked 87th out of 500 lenders. The top three lenders were Community America Credit Union with 9.8 percent market share, Fairway Independent Mortgage Corporation with a 4.2 percent market share and, Rocket Mortgage with a 3.6 percent market share.

For small loans to businesses, Academy Bank's market share of 0.3 percent ranked 32nd out of 176 lenders (top 50 percent). The top three lenders were American Express National Bank with a 20.4 percent market share, Chase Bank USA, National Association, with an 18.3 percent market share, and U.S. Bank, National Association, with a 10.3 percent market share. The top seven small business lenders were institutions that have large business credit card portfolios with average loan sizes of less than \$25 thousand.

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 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 bank exhibits an adequate geographic distribution of home mortgage loans in the Kansas City, MO-KS MMSA.

2021

The percentage of home mortgage loans originated or purchased in low-income geographies was below the percentage of owner-occupied housing units and equal to aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies was below both the percentage of owner-occupied housing units and aggregate percentage of all reporting lenders.

2022-2023

The percentage of home mortgage loans originated or purchased low-income geographies is below both the percentage of owner-occupied housing units and aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased moderate-income geographies is well below both the percentage of owner-occupied housing units and aggregate percentage of all reporting lenders. The percentage of owner-occupied housing units in low-income geographies decreased and increased in moderate-income geographies compared to 2021. The number of low-income CTs in the AA decreased from 78 in 2021 to 56 in 2023. The number of moderate-income CTs in the AA increased from 108 in 2021 to 138 in 2023.

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 bank exhibits a good geographic distribution of small loans to businesses in the Kansas City, MO-KS MMSA.

2021

The percentage of small loans to businesses in low- and moderate-income geographies is in line with both the percentage of businesses and aggregate percentage of all reporting lenders.

2022-2023

The percentage of small business loans originated to businesses in low-income geographies is equal to the percentage of businesses and slightly exceeded the aggregate percentage of all reporting lenders. The percentage of small business loans originated in moderate-income geographies was below the percentage of businesses but above the aggregate percentage of all reporting lenders.

Consumer Loans

Refer to Table U in the MMSA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The bank exhibits an excellent geographic distribution of consumer loans in the Kansas City, MO-KS MMSA.

2021

The percentage of consumer loans originated in low-income geographies exceeded the percentage of households and the percentage of consumer loans originated in moderate-income geographies significantly exceeded the percentage of households. The bank originated 35.3 percent of consumer loans in moderate-income geographies compared to 22.1 percent of households.

2022-2023

The percentage of consumer loans originated in low-income geographies slightly exceeded the percentage of households and the percentage of consumer loans originated in moderate-income geographies significantly exceeded the percentage of households. The bank originated 38.0 percent of consumer loans in moderate-income geographies compared to 24.6 percent of households.

Lending Gap Analysis

Examiners analyzed Academy's lending patterns and reviewed summary reports and maps of home mortgage loans, small loans to businesses, and consumer loans to identify any gaps in the geographic distribution of loans in the AA. Examiners focused on clusters of low- and moderate-income census tracts with no lending in the AA and then evaluated those clusters to determine if demographic information, or other performance context data reflected lending opportunities within those clusters. Examiners did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good 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

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 bank exhibits an adequate borrower distribution of home mortgage loans in the Kansas City, MO-KS MMSA. The OCC considered challenges low-income borrowers would likely encounter to qualify and afford home mortgage financing, as previously discussed.

2021

The percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers was near to both the percentage of moderate-income families and the aggregate percentage of all reporting lenders.

Based on the information in 2021 Table A above, low-income families earned less than \$36,312, and moderate-income families earned less than \$58,098. The median housing value in the AA is \$163,248. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30.0 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$908 for a low-income borrower and \$1,452 for a moderate-income borrower. Assuming a 30-year mortgage with a 5.0 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$876. Based on these calculations, low-income borrowers would be challenged to qualify for and afford home mortgage financing in this AA.

2022-2023

The percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and well below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers was near to the percentage of moderate-income families and below the aggregate percentage of all reporting lenders.

Based on the information in 2022-2023 Table A above, low-income families earned less than \$43,281, and moderate-income families earned less than \$69,250. The median housing value in the AA is \$204,108. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30.0 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$1,082 for a low-income borrower and \$1,452 or \$1,731 for a moderate-income borrower. Assuming a 30-year mortgage with a 5.0 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$1,096. Based on these calculations, low-income borrowers would be challenged to qualify for and afford home mortgage financing in this 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 bank exhibits an adequate borrower distribution of small loans to businesses in the Kansas City, MO-KS MMSA.

2021

The percentage of small loans to businesses with gross annual revenues of \$1 million or less was below the percentage of those businesses and exceeded the aggregate percentage of all reporting lenders.

2022-2023

The percentage of small loans to businesses with gross annual revenues of \$1 million or less was well below both the percentage of those businesses and the aggregate percentage of all reporting lenders.

Consumer Loans

Refer to Table V in the MMSA section of Appendix D for the facts and data used to evaluate the borrower distribution of the institution's consumer loan originations and purchases.

The bank exhibits an excellent distribution of consumer loans in the Kansas City, MO-KS MMSA.

2021

The percentage of consumer loans to low-income households exceeded the percentage of low-income households. The percentage of consumer loans to moderate-income households exceeded the percentage of moderate-income households.

2022-2023

The percentage of consumer loans to low-income households exceeded the percentage of low-income households. The percentage of consumer loans to moderate-income households exceeded the percentage of moderate-income households.

Community Development Lending

The institution is a leader in making CD loans.

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.

Over the assessment period, the bank made 13 CD loans in the Kansas City MSA totaling \$24,258,475 or 10.0 percent of tier 1 capital allocated to the Kansas City MSA.

Qualified loans included:

- Extending credit to a non-profit community service program serving LMI populations.
- Credit to businesses in an opportunity zone.
- Credit to business assisting LMI youth.
- Credit that supported job creation.

Product Innovation and Flexibility

The institution makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. As mentioned in the Overall CRA Rating section above, the CBSCCP program was established to help build the credit history of low- or moderate-income individuals. During the evaluation period, Academy Bank in the Kansas City MMSA assessment area had 1,578 card holders with \$503 thousand in approved credit from the CBSCCP.

INVESTMENT TEST

The institution’s performance under the Investment Test in Kansas City, MO-KS MMSA is rated Low Satisfactory.

Based on a full-scope review, the institution’s performance in the Kansas City, Missouri-Kansas MSA AA is adequate.

The bank 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 rarely uses innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

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

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Kansas City, MO-KS MMSA	35	5,304	67	3,287	102	100.0	8,592	100.0	0	0

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

The bank made 67 current period investments and donations totaling \$3.3 million. Total investments are equivalent to 3.6 percent of allocated tier 1 capital. The institution had \$5.3 million in prior period investments and no unfunded investment commitments.

Most of the institution’s investments were in mortgage-backed securities.

Examples of qualified investments in this AA include:

- A \$2,000 donation to a nonprofit organization that provides workforce development to LMI individuals.
- A \$1,000 donation to a nonprofit organization that provides food access to LMI individuals.
- Three grants totaling \$3,500 to a nonprofit organization that provides transitional and emergency housing to LMI individuals.

SERVICE TEST

The institution’s performance under the Service Test in Kansas City, MO-KS MMSA is rated High Satisfactory.

Based on a full-scope review, the institution’s performance in the Kansas City, MO-KS MMSA is good.

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution’s AA. Academy does not operate any branches in low-income geographies and the distribution of branches in moderate-income geographies is in-line with the percentage of population in that geography. Six of eight Walmart in-store branches in the AA located in middle- or-upper income geographies are adjacent to moderate-income tracts. According to Start.io, as of November 2024, 52.4 percent of Walmart shoppers have a household income of less than \$39,999. This is an increase from 2021 in which 45.3 percent of shoppers had a household income of less than \$39,999.

U.S. Census tract changes updated for the 2020 census resulted in one branch changing census tracts from 2021 to 2022 from moderate-income to middle-income.

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Kansas City, MO-KS MMSA	100.0	25	100.0	0.0	24.0	28.0	48.0	0.0	7.3	24.0	37.3	30.8	0.7

Academy offers additional services that provide for alternative delivery system to customers that includes deposit-taking ATMs, online banking, telephone banking, and mobile banking. Academy also participates in the Cash2Debit program in which customers can go to a variety of retailers such as Walmart, drug stores, or convenience stores and swipe their Academy Bank debit card and hand the cash to the cashier with the cash then added to their Academy account. There are 35 Cash2Debit locations in the AA. Academy operates 39 deposit-taking ATMs in the AA with eight of them located in moderate-income tracts and none in low-income tracts, and 18 of the 39 deposit-taking ATMs are interactive teller machines (ITMs) which allow a direct interface with an actual human teller.

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

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. In the Kansas City MMSA, there was one branch closing in a moderate-income census tract with the nearest open branch being over seven miles away. Academy Bank also opened a new branch in an upper income census tract in the same assessment area during the period while not opening any new branches or distribution centers in a low- or moderate-income census tract area.

Services, including where appropriate, business hours are tailored to the convenience and needs of the various portions of its AA(s), particularly low- and moderate-income geographies and/or individuals. Academy Bank offers traditional branch operations throughout the assessment area including both free standing locations with drive thru services and leased spaces inside Walmart retail stores. Operating hours are reasonable and fairly consistent across locations.

Community Development Services

The institution is a leader in providing CD services.

Services included 864 hours of community service. The bank has 12 employees comprise of leadership positions in these organizations including committee or board seats. Academy Bank participated in 22 total organizations during the assessment period. Organizations impacted include financial services, education providers, and local food banks. Examples of CD services include:

- Financial education targeted to low- and moderate-income individuals related to home mortgage financing, banking products, and budgeting.
- Employees in leadership positions with CD organizations that provide community services to low and moderate-income individuals, including healthcare and mentoring services.

State Rating

State of Arizona

CRA rating for the State of Arizona²: 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:

- Academy originated a significant amount of small dollar consumer loans.
- Academy demonstrated excellent responsiveness in making CD loans in the AA.
- The distribution of loans among borrowers of different income levels and businesses of different sizes in the AA is excellent.
- The distribution of loans to consumers of different incomes is excellent and the geographic distribution of loans to low- and moderate-income geographies is excellent.
- Branches are reasonably accessible to low- and moderate-income borrowers.
- The CD Investment test is outstanding demonstrating excellent responsiveness to credit needs.

Description of Institution's Operations in Arizona

Academy delineated three AAs within the state of Arizona. The AAs include the Phoenix, AZ MSA which received a full-scope review, Tucson MSA (Pima County), and Yuma MSA (Yuma County), which received limited-scope reviews. Academy operated six branches and eight deposit-taking ATMs in Arizona with no branches and no deposit-taking ATMs in low-income CTs and two branches and two deposit-taking ATMs located in moderate-income CTs. Based on the FDIC Deposit Market Share Report as of June 30, 2023, Academy's deposits in the state of Arizona totaled \$86.3 million, or 4.2 percent of the bank's total deposits.

Phoenix MSA

The Phoenix MSA was the only AA in the state of Arizona selected for a full-scope review. The Phoenix AA includes a portion of the Phoenix, AZ MSA. The Phoenix AA is comprised of the entire Maricopa County, one of the two counties that make up the Phoenix MSA. The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies.

Academy operated four branches within the Phoenix AA, representing 5.6 percent of its total branches. The bank also operated six deposit-taking ATMs in this AA, representing 7.2 percent of its total deposit-taking ATMs. Based on Table A (2022-2023) below, this AA has 63 low-income, 259 moderate-income, 314 middle-income, 348 upper-income, and 24 unclassified CTs. Academy operated no branches and no deposit-taking ATMs in low-income census tracts (CTs) and one branch and one deposit-taking ATM in moderate-income CTs.

Based on the FDIC's Deposit Market Share Report from June 30, 2023, Academy's deposits in the Phoenix AA comprised approximately 2.9 percent of total deposits. Deposit competition is strong. The

² 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.

FDIC Market Share report as of June 30, 2023, indicated there are 57 direct competitors operating 639 offices. Academy bank ranked 47th in the market with less than 1 percent of the deposit market share. The top three banks by deposit market share are JPMorgan Chase Bank, Bank of America, and Western Alliance Bank.

The following tables provides a summary of the demographics that include housing, business, and farm information for the Phoenix AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Phoenix MSA AA – 2021						
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	792,533	7.0	15.2	29.5	47.8	0.5
Farms by Geography	12,656	7.2	18.5	28.9	45.1	0.3
Family Distribution by Income Level	945,115	21.8	16.9	19.2	42.2	0.0
Household Distribution by Income Level	1,442,518	23.3	16.3	17.7	42.7	0.0
Median Family Income MSA - 38060 Phoenix-Mesa-Chandler, AZ MSA		\$63,686	Median Housing Value			\$203,811
Median Household Income: \$59,909			Median Gross Rent			\$993
Households Below Poverty Level: 14.4%			Families Below Poverty Level			12.6%
<i>Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Phoenix MSA AA – 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,009	6.3	25.7	31.1	34.5	2.4
Population by Geography	4,420,568	5.8	25.6	32.6	35.4	0.6
Housing Units by Geography	1,765,880	5.4	26.5	33.5	34.3	0.4
Owner-Occupied Units by Geography	1,008,487	2.6	20.6	34.7	41.9	0.1
Occupied Rental Units by Geography	588,297	10.0	35.6	31.6	22.1	0.7
Vacant Units by Geography	169,096	5.6	29.3	32.5	32.0	0.6
Businesses by Geography	1,047,857	4.0	18.2	28.5	48.8	0.5
Farms by Geography	17,296	4.4	20.4	30.2	44.4	0.7
Family Distribution by Income Level	1,047,899	20.4	17.9	20.0	41.7	0.0
Household Distribution by Income Level	1,596,784	22.3	16.9	18.5	42.3	0.0
Median Family Income MSA - 38060 Phoenix-Mesa-Chandler, AZ MSA		\$78,930	Median Housing Value			\$292,183
Median Household Income: \$74,190			Median Gross Rent			\$1,221
Household Poverty Level: 11.2%			Families Below Poverty Level			9.1%
<i>Source: 2020 U.S. Census and 2023 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>						

Employment and Economic Data

The primary industries in the AA include trade, transportation, and utilities; education and health services; and professional and business services. Some of the major employers in the area include Banner Health, Wells Fargo Bank, HonorHealth, and Arizona State University. Also, headquartered in the area is PetSmart, Best Western, and Avnet.

According to Moody's Analytics, the employment sector is heavily reliant on financial services and technology, which can cause some volatility. The average wages are below other western states. According to the U.S. Bureau of Labor Statistics, the unemployment rates for the Phoenix MSA decreased from 6.1 percent in January 2021 to 3.4 percent in December 2023. The national unemployment rate was 3.7 percent as of December 2023.

Community Contacts

As part of the CRA evaluation, the OCC reviewed information from one community contact within the Phoenix AA to better understand area credit and community needs. The contact was an organization focused on economic development. The contact stated the local economy was doing well and continues to grow post-pandemic. The contact cited a need for small business lending and investments. The contact also stated that housing prices have made it difficult for individuals with entry-level jobs, recent graduates, and even those in healthcare and public service to find housing. The contact stated there was a need for bank to finance multi-family projects.

Scope of Evaluation in Arizona

The Phoenix AA was selected for a full-scope review and has the greatest weight applied for the state analysis with the AA having four of the six branch locations in Arizona, six of the 10 deposit-taking ATMs, 68.0 percent of the bank branch deposits, and 49.3 percent of total bank loans by number for the evaluation period. The two other AAs received limited-scope reviews with each of those AAs only having one branch located in each.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ARIZONA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

2021

Number of Loans*								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Phoenix MSA	14	122	0	0	393	529	51.2	55.6
Tucson MSA	2	7	0	0	157	166	16.1	16.8
Yuma MSA	0	5	0	0	334	339	32.8	27.6
TOTAL	16	134	0	0	884	1,034	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*								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Phoenix MSA	3,568,989	23,632,000	0	0	307,000	27,507,989	88.4	55.6
Tucson MSA	464,221	2,509,000	0	0	131,000	3,104,221	10.0	16.8
Yuma MSA	0	351,000	0	0	164,000	515,000	1.7	27.6
TOTAL	4,033,210	26,492,000	0	0	602,000	31,127,210	100.0	100.0

Source: Bank Data; "--" data not available.
Due to rounding, totals may not equal 100.0%

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

2022-2023

Number of Loans*								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Phoenix MSA	52	34	0	2	579	667	48.1	68.0
Tucson MSA	2	4	0	0	205	211	15.2	15.6
Yuma MSA	0	0	0	0	510	510	36.7	16.3
TOTAL	54	38	0	2	1,294	1,388	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*								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Phoenix MSA	27,949,484	9,961,000	0	7,917,371	738,000	46,565,855	94.8	68.0
Tucson MSA	782,350	1,025,000	0	0	243,000	2,050,350	4.2	15.6
Yuma MSA	0	0	0	0	500,000	500,000	1.0	16.3
TOTAL	28,731,834	10,986,000	0	7,917,371	1,481,000	49,116,205	100.0	100.0

Source: Bank Data; "--" data not available.
Due to rounding, totals may not equal 100.0%

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

In 2023, in the Phoenix MSA, Academy Bank ranked 318th out of 889 institutions in the home mortgage lending market share by number of loans (0.02 percent), and 318th by dollar amount (0.02 percent). Market share information for mortgage loans shows Academy Bank operates in a highly competitive banking environment that includes specialized mortgage lending companies and larger state and nationwide banks.

For small loans to businesses in 2023, Academy ranked 81st out of 237 lenders in the Phoenix MSA by number of loans (0.01 percent) and 68th by dollar amount (0.11 percent). A significant amount of competition also exists within the AAs with the top lenders being JPMorgan Chase, American Express, and Bank of America.

As evidenced by the above tables, consumer loans are the banks primary lending product by number.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AA(s).

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 bank exhibits a poor geographic distribution of home mortgage loans in the Phoenix MSA.

2021

The bank did not originate a sufficient volume of loans to conduct a meaningful analysis.

2022-2023

No home mortgage loans were originated or purchased in low-income geographies. The percentage of home mortgage loans originated in moderate-income geographies was below the percent of owner-occupied housing units and slightly below the aggregate percentage of all reporting lenders.

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 bank exhibits a good geographic distribution of small loans to businesses in the Phoenix MSA.

2021

The percentage of small loans to businesses originated in low-income geographies exceeded the percentage of business and aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated in moderate-income geographies significantly exceeded the percentage of businesses and aggregate percentage of all reporting lenders. The bank originated 30.2 percent of small loans to businesses in moderate-income geographies compared to 15.2 percent of businesses and 16.2 aggregate of all reporting lenders.

2022-2023

The percentage of small loans to businesses originated in low-income tracts exceeded both the percentage of businesses and aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated in moderate-income tracts was considerably lower than the percentage of businesses and aggregate percentage of all reporting lenders.

Consumer Loans

Refer to Table U in the state of Arizona section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The bank exhibits an excellent geographic distribution of consumer loans in the Phoenix MSA.

2021

The percentage of consumer loans originated in both low- and moderate-income geographies significantly exceeds the percentage of low- and moderate-income households. The bank originated 24.9 percent of consumer loans in low-income CTs and 33.3 percent in moderate-income CTs compared to 9.5 percent and 23.0 percent of households, respectively.

2022-2023

The percentage of consumer loans originated in both low- and moderate-income geographies significantly exceeds the percentage of households. The bank originated 14.0 percent of consumer loans in low-income CTs and 45.3 percent in moderate-income CTs compared to 5.3 percent and 26.2 percent of households, respectively.

Lending Gap Analysis

Examiners analyzed Academy's lending patterns and reviewed summary reports and maps of home mortgage loans, small loans to businesses, and consumer loans to identify any gaps in the geographic distribution of loans in the AA. Examiners focused on clusters of low- and moderate-income census tracts with no lending in the AA and evaluated those clusters to determine if demographic information or other performance context data reflected lending opportunities within those clusters. Examiners did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent 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

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 bank exhibits an adequate borrower distribution of home mortgage loans in the Phoenix MSA. The OCC considered challenges low- and moderate-income borrowers would likely encounter to qualify and afford home mortgage financing, as previously discussed.

2021

The bank did not originate a sufficient volume of loans to conduct a meaningful analysis.

2022-2023

The percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and well below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers was below the percentage of moderate-income families but near to the aggregate percentage of all reporting lenders.

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 bank exhibits an adequate borrower distribution of small loans to businesses in the Phoenix MSA.

2021

The percentage of small loans to businesses with gross annual revenues of \$1 million or less was well below the percentage of those businesses but exceeded the aggregate percentage of all reporting lenders.

2022-2023

The percentage of small loans to businesses with gross annual revenues of \$1 million or less was well below both the percentage of those businesses and the aggregate percentage of all reporting lenders.

Consumer Loans

Refer to Table V in the state of Arizona section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The bank exhibits an excellent borrower distribution of consumer loans in the Phoenix MSA.

2021

The percentage of consumer loans to low-income households exceeded both the percentage of low-income households and the aggregate percentage of all reporting lenders. The percentage of consumer loans to moderate-income households exceeded both percentage of moderate-income households and the aggregate percentage of all reporting lenders.

2022-2023

The percentage of consumer loans to low-income households exceeded both the percentage of low-income households and the aggregate percentage of all reporting lenders. The percentage of consumer loans to moderate-income households exceeded both percentage of moderate-income households and the aggregate percentage of all reporting lenders.

Community Development Lending

The institution is a leader in making CD loans.

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.

Over the assessment period, the bank made two CD loans in the state of Arizona totaling \$7,917,371 or 67.1 percent of tier 1 capital allocated to the Phoenix AA. One loan supported adults getting their high school diploma tuition free. The other note supported job creation in Phoenix.

Product Innovation and Flexibility

The institution makes little use of innovative and/or flexible lending practices to serve AA credit needs. Academy Bank made limited use of flexible lending practices to serve AA credit needs. As mentioned in the Overall CRA Rating section above, the CBS CCP program was established to help build the credit history of low- or moderate-income individuals. During the evaluation period, Academy Bank in the State of Arizona, 774 card holders with \$162 thousand in approved credit from the CBS CCP.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s performance under the Lending Test in the Tucson MSA and Yuma MSA is consistent with the bank’s overall performance under the Lending Test in the full-scope area.

Due to loan volume, an analysis of lending performance could not be conducted on home mortgage loans and small loans to businesses in the Tucson MSA and Yuma MSA.

Refer to Tables O through V in the state of Arizona section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

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

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

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Phoenix MSA	1	239	5	604	6	66.7	843	61.4	0	0
Limited-Scope										
Tucson MSA	1	214	1	215	2	22.2	429	31.3	0	0
Yuma MSA	1	100	0	0	1	11.1	100	7.3	0	0
Totals	3	553	6	819	9	100.0	1,372	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.

Phoenix, AZ MSA

Performance in the AA is excellent. Qualified investments totaled \$843,000, with current period investments totaling \$596,000, donations totaling \$7,500 and prior period investments totaling \$239,000. Total investments represent 7.15 percent of allocated tier 1 capital.

Examples of qualified investments in this AA include:

- A \$344,800 Freddie Mac multifamily bond for an affordable housing complex located in Phoenix, Arizona where 100 percent of the units are reserved for LMI individuals.
- A total of \$7,500 in donations to a nonprofit organization that provides community services including serving as homeless shelter and providing workforce development to LMI individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Yuma MSA is weaker than the bank's overall performance under the Investment Test in the full-scope area due to investments as a percentage of capital totaling 3.53 percent.

Based on limited-scope reviews, the bank's performance under the Investment Test in the Tucson AA is stronger than the bank's overall performance under the Investment Test in the full-scope area due to investments as a percentage of capital totaling 15.83 percent.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Phoenix 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. Academy does not operate any branches in low-income geographies and the distribution of branches in moderate-income geographies in the Phoenix MSA and Tucson MSA are similar to the percentage of population in those geographies. The Walmart in-store branch located in a middle-income CT in the Phoenix MSA is adjacent to two low-income CT and one moderate-income CT. The Walmart in-store branch in the Yuma MSA is adjacent to a moderate-income CT. According to Start.io, as of November 2024, 52.4 percent of Walmart shoppers have a household income of less than \$39,999. This is an increase from 2021 in which 45.3 percent of shoppers had a household income of less than \$39,999. In the Phoenix MSA, the distribution of branches in moderate-income geographies met demographics with 25.0 percent of the branches are in moderate-income geographies. There are no branches in low-income tracts in the Phoenix MSA, which has only 5.8 percent of the population.

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Phoenix MSA	68.0	4	66.7	0	25.0	50.0	25.0	0.0	5.8	25.6	32.6	35.4	0.6
Tucson MSA	15.6	1	16.7	0	100.0	0	0	0.0	3.9	32.5	28.5	33.6	1.6
Yuma MSA	16.3	1	16.7	0	0	100.0	0	0.0	1.8	22.2	44.5	31.1	0.5

The Phoenix assessment area demonstrates adequate branch distribution. Academy offers traditional banking services in the assessment area at both free-standing locations with drive up services, and leased retail spaces inside Walmart stores. Academy offers additional services that provide for alternative delivery system to customers that includes deposit-taking ATMs, online banking, telephone banking, and mobile banking. Academy also participates in the Cash2Debit program in which customers can go to a variety of retailers such as Walmart, drug stores, or convenience stores and swipe their Academy Bank debit card and hand the cash to the cashier with the cash then added to their Academy account. There are 48 Cash2Debit locations in the Phoenix AA, 16 in the Tucson AA, and four in the Yuma AA. Academy operates 10 deposit-taking ATMs in the Arizona with eight of them located in the Phoenix AA and one each in the Tucson and Yuma AAs. Two ATMs are located in moderate-income tracts in the Phoenix AA and one in the Tucson AA. There are no ATMs in low-income tracts, and two of the 10 ATMs are ITMs which allow a direct interface with an actual human teller.

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

To the extent changes have been made, the institution’s opening and closing of branches has significantly adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

Academy Bank closed one branch in a moderate-income census tract leaving the nearest open branch over seven miles away. Additionally, Academy Bank opened a new branch in a middle-income census tract and did not open any new delivery channels in low- or moderate-income areas.

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

Academy offers traditional retail banking products including checking and savings accounts. Academy offers debit card and personal check processing services for its customers. Academy also offers various consumer loans including personal loans and automobile loans.

Community Development Services

The institution provides few if any CD services.

Academy provides few CD services in the Phoenix AA. Four employees participated in services to three different organizations spending 18 hours in total during the assessment period with eight hours related to economic development and ten hours towards community services organizations.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Tucson MSA and Yuma MSA is consistent with the bank's overall performance under the Service Test in the full-scope area.

State Rating

State of Colorado

CRA rating for the State of Colorado³: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- The geographic distribution of loans to low- and moderate-income geographies is excellent.
- The distribution of loans among borrowers of different income levels and businesses of different sizes is excellent.
- Academy is a leader making community development loans.
- Academy's branch distribution is accessible to low- and moderate-income borrowers.
- Academy has a relatively high level of community development services.
- The bank had an adequate level of CD investments in the Denver MSA.

Description of Institution's Operations in Colorado

Academy delineated seven (2021) and five (2022-2023) AAs within the state of Colorado. The AAs include the Denver MSA (Adams, Arapahoe, Denver, and Jefferson Counties) which received a full-scope review, Boulder MSA (Boulder County; 2021 only) Colorado Springs MSA (El Paso County), Fort Collins MSA (Larimer County), Grand Junction MSA (Mesa County), Greeley MSA (Weld County) and Pueblo MSA (Pueblo County) which all received limited-scope reviews.

Academy operated 26 branches and 30 deposit-taking ATMs in Colorado with no branches and no deposit-taking ATMs in low-income CTs and 12 branches and 13 deposit-taking ATMs located in moderate-income CTs. Based on the FDIC Deposit Market Share Report as of June 30, 2023, Academy's deposits in the state of Colorado totaled \$534 million, or 26.1 percent of the bank's total deposits.

Denver MSA

The Denver AA was the only AA in the state of Colorado selected for a full-scope review. The Denver AA includes a portion of the Denver, CO MSA. The Denver AA is comprised of the entire counties of Adams, Arapahoe, Denver, and Jefferson counties, four of the 10 counties that make up the Denver, CO MSA. The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies.

Academy operated 12 branches within the Denver AA, representing 16.9 percent of its total branches. The bank also operated 15 deposit-taking ATMs in this AA, representing 16.9 percent of its total deposit-taking ATMs. Based on Table A (2022-2023) below, the Denver AA has 37 low-income, 170 moderate-income, 217 middle-income, 152 upper-income, and 16 unclassified CTs. Academy operated

³ 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.

no branches and no deposit-taking ATMs in low-income census tracts (CTs) and six branches and six deposit-taking ATMs in moderate-income CTs.

Based on the FDIC’s Deposit Market Share Report from June 30, 2023, Academy’s deposits in the Denver AA totaled \$294 million, or 14.4 percent of total deposits. Deposit competition is strong. The FDIC Market Share report as of June 30, 2023, indicated there are 61 direct competitors operating 494 offices. Academy Bank ranked 25th in the market with less than one percent of the deposit market share. The top three banks by deposit market share are Wells Fargo Bank, JPMorgan Chase Bank, and FirstBank.

The following tables provides a summary of the demographics that include housing, business, and farm information for the Denver AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Denver MSA AA – 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	526	9.7	27.9	32.9	28.5	1.0
Population by Geography	2,281,514	10.3	28.3	33.9	27.4	0.1
Housing Units by Geography	933,145	9.7	27.4	35.1	27.8	0.0
Owner-Occupied Units by Geography	535,725	5.6	22.6	36.4	35.5	0.0
Occupied Rental Units by Geography	349,191	15.6	34.5	33.4	16.4	0.0
Vacant Units by Geography	48,229	13.2	28.6	32.6	25.7	0.0
Businesses by Geography	430,258	8.0	22.2	32.5	36.9	0.4
Farms by Geography	7,211	9.6	23.9	32.6	33.6	0.4
Family Distribution by Income Level	541,065	23.6	18.7	20.6	37.1	0.0
Household Distribution by Income Level	884,916	25.3	17.5	18.6	38.6	0.0
Median Family Income MSA - 19740 Denver-Aurora-Lakewood, CO MSA		\$80,820	Median Housing Value			\$268,712
Median Household Income: \$66,417			Median Gross Rent			\$1,044
Households Below Poverty Level: 11.6%			Families Below Poverty Level			9.0%
<i>Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Denver MSA AA – 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	592	6.3	28.7	36.7	25.7	2.7
Population by Geography	2,473,074	6.1	31.3	35.6	26.0	1.1
Housing Units by Geography	970,332	6.0	30.6	36.6	25.5	1.4
Owner-Occupied Units by Geography	576,709	3.5	24.9	40.1	30.9	0.6
Occupied Rental Units by Geography	349,233	10.0	39.8	31.4	16.3	2.6
Vacant Units by Geography	44,390	6.5	32.7	31.5	26.8	2.4
Businesses by Geography	639,655	4.7	25.7	32.5	33.0	4.0
Farms by Geography	10,234	5.3	27.1	35.6	29.6	2.4
Family Distribution by Income Level	560,253	22.3	19.3	22.0	36.4	0.0
Household Distribution by Income Level	925,942	24.2	18.0	19.3	38.6	0.0
Median Family Income MSA - 19740 Denver-Aurora-Lakewood, CO MSA		\$103,157	Median Housing Value			\$416,577
Median Household Income: \$83,991			Median Gross Rent			\$1,431
Households Below Poverty Level: 8.6%			Families Below Poverty Level			6.1%
<i>Source: 2020 U.S. Census and 2023 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>						

Based on Table A (2022-2023), the Denver AA has a population of 2.5 million, which includes 925,942 households and 970,332 housing units, with 95.4 percent occupancy. The median housing value is \$416,577.

In the performance context, examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the information in the above respective tables, low-income families earned less than \$40,410 (2021) or \$51,579 (2022-2023), and moderate-income families earned less than \$64,656 (2021) or \$82,526 (2022-2023). The median housing value in the AA is \$268,712 (2021) or \$416,577 (2022-2023). One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30.0 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was between \$1,010 (2021) or \$1,289 (2022-2023) for a low-income borrower and \$1,616 (2021) or \$2,063 (2022-2023) for a moderate-income borrower. Assuming a 30-year mortgage with a 5.0 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$1,443 (2021) or \$2,236 (2022-2023). Based on these calculations, low-income borrowers and moderate-income borrowers would be challenged to qualify for and afford home mortgage financing in this AA.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income

above the poverty level. For this AA, 9.0 percent (2021) and 6.1 (2022-2023) percent of families were living below the poverty level.

Employment and Economic Data

According to Moody's Analytics, Denver has strong population growth and employment growth due to a strong business startup scene and an increase in gross metro product trends. Increasing housing and rental prices are a major concern for the Denver MSA. The primary industries in the AA include professional and business services, transportation and utilities, education and health services, and government. Some of the major employers in the area include the Denver International Airport, HealthONE Corporation, and Lockheed-Martin. Also, headquartered in the area is Dish Network, Western Union, and Arrow Electronics.

According to the U.S. Bureau of Labor Statistics, the unemployment rates for the Denver MSA decreased from 6.6 percent in January 2021 to 3.3 percent in December 2023. The national seasonally adjusted unemployment rate was 3.7 percent as of December 2023.

Community Contacts

As part of the CRA evaluation, the OCC reviewed information from two community contacts within the Denver AA and one statewide community contact to better understand area credit and community needs. Contacts were performed in January 2021 through December 2023, and included organizations focused on economic development, affordable housing, and community development. Contacts cited a need for affordable housing and small business lending and investments. One contact commented that partnerships might be of assistance between banks and non-profit organizations, including investments in mortgage related bonds for loans primarily to low- and moderate-income individuals.

Scope of Evaluation in Colorado

The Denver AA was selected for a full-scope review out of the five total AAs in Colorado and has the greatest weight applied for the state analysis with the AA having 12 of the 26 branch locations in Colorado or 46.2 percent, 15 of the 30 deposit-taking ATMs, 55.1 percent of the bank branch deposits, and 49.6 percent of total bank loans by number for the evaluation period. The four other AAs received limited-scope reviews.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN COLORADO

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

2021

Number of Loans*								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Boulder MSA	3	16	0	1	79	98	2.0	2.5
Colorado Springs MSA	12	141	0	0	769	922	18.9	31.6
Denver MSA	43	179	0	2	2,158	2,380	48.8	45.0
Fort Collins MSA	6	7	0	0	253	266	5.5	5.0
Grand Junction MSA	0	2	0	0	193	195	4.0	3.8
Greeley MSA	4	16	0	0	522	542	11.1	3.5
Pueblo MSA	0	7	0	0	463	470	9.6	8.6
TOTAL	68	368	0	3	4,437	4,873	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*								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Boulder MSA	2,854,350	2,659,000	0	1,682,600	67,000	7,262,950	8.3	2.5
Colorado Springs MSA	4,340,032	10,424,000	0	0	694,000	15,458,032	17.8	31.6
Denver MSA	21,516,637	19,204,000	0	14,600,000	1,742,000	57,062,637	65.5	45.0
Fort Collins MSA	2,324,523	594,000	0	0	242,000	3,160,523	3.6	5.0
Grand Junction MSA	0	72,000	0	0	164,000	236,000	0.3	3.8
Greeley MSA	1,398,534	1,333,000	0	0	468,000	3,199,534	3.7	3.5
Pueblo MSA	0	237,000	0	0	436,000	673,000	0.8	8.6
TOTAL	32,434,076	34,523,000	0	16,282,600	3,813,000	87,052,676	100.0	100.0

Source: Bank Data; "--" data not available.
Due to rounding, totals may not equal 100.0%

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

2022-2023

Number of Loans*								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Colorado Springs MSA	1	25	0	2	1,195	1,223	18.6	26.3
Denver MSA	16	40	0	1	3,088	3,146	47.9	55.1
Fort Collins MSA	2	0	0	0	423	425	6.5	6.4
Greeley MSA	1	0	0	0	921	922	14.0	4.1
Pueblo MSA	1	0	0	0	855	856	13.0	8.0
TOTAL	21	65	0	3	6,482	6,572	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*								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Colorado Springs MSA	777,000	6,600,000	0	100,000	1,858,000	9,335,000	22.1	26.3
Denver MSA	9,469,149	13,159,000	0	532,632	4,797,000	27,957,781	66.1	55.1
Fort Collins MSA	879,647	0	0	0	1,099,000	1,978,647	4.7	6.4
Greeley MSA	508,261	0	0	0	1,230,000	1,738,261	4.1	4.1
Pueblo MSA	183,302	0	0	0	1,083,000	1,266,302	3.0	8.0
TOTAL	11,817,359	19,759,000	0	632,632	10,067,000	42,275,991	100.0	100.0

Source: Bank Data; "--" data not available.
Due to rounding, totals may not equal 100.0%

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

Based on 2023 aggregate HMDA data, Academy ranked 414th out of 604 lenders by number (less than 0.00 percent) and 405th by dollar amount (0.01 percent). Market share information for mortgage loans shows Academy Bank operates in a highly competitive banking environment that includes specialized mortgage lending companies and larger state and nationwide banks. The top five largest mortgage lenders captured 22.2 percent of the market. United Wholesale Mortgage and Rocket Mortgage are the top two home mortgage loan originators.

Based on 2023 aggregate small business data, Academy ranked 45th out of 198 lenders by number (0.13 percent) and 27th by dollar amount (0.84 percent). Market competition in the AA is high. The top three lenders include JPMorgan Chase, American Express, and US Bank. These three lenders captured 54.1 percent of the market.

Consumer loans are the bank's primary lending product number.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of home mortgage loans in the Denver MSA.

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 bank exhibits a poor geographic distribution of home mortgage loans in the Denver MSA.

2021

The percentage of home mortgage loans originated or purchased in low-income geographies was less than half the percentage of owner-occupied housing units and aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies was below the percentage of owner-occupied housing units and aggregate percentage of all reporting lenders.

2022-2023

The bank did not originate a sufficient volume of loans to conduct a meaningful analysis.

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 bank exhibits a good geographic distribution of small loans to businesses in the Denver MSA.

2021

The percentage of small loans to businesses originated in low-income geographies was above the percentage of businesses and aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated in moderate-income geographies was significantly below the percentage of businesses and aggregate percentage of all reporting lenders.

2022-2023

The percentage of small loans to businesses originated in low-income geographies significantly exceeded the number of small businesses and aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated in moderate-income geographies slightly below the percentage of business and aggregate percentage of all reporting lenders.

Consumer Loans

Refer to Table U in the state of Colorado section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The bank exhibits an excellent geographic distribution of consumer loans in the Denver MSA.

2021

The percentage of consumer loans originated in low-income geographies exceeded the percentage of low-income households. The percentage of consumer loans originated in moderate-income geographies significantly exceeded the percentage of moderate-income households.

2022-2023

The percentage of consumer loans originated in low-income geographies exceeded the percentage of low-income households. The percentage of consumer loans originated in moderate-income geographies significantly exceeded the percentage of moderate-income households.

Lending Gap Analysis

Examiners analyzed Academy's lending patterns and reviewed summary reports and maps of home mortgage loans, small loans to businesses, and consumer loans to identify any gaps in the geographic distribution of loans in the AA. Examiners focused on clusters of low- and moderate-income census tracts with no lending in the AA, and evaluated those clusters to determine if demographic information, or other performance context data reflected lending opportunities within those clusters. Examiners did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent 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

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.

The bank exhibits an excellent borrower distribution of home mortgage loans in the Denver MSA.

2021

The percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate percentage of all reporting lenders.

2022-2023

The bank did not originate a sufficient volume of loans to conduct a meaningful analysis.

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 bank exhibits an adequate borrower distribution of small loans to businesses in the Denver MSA.

2021

The percentage of small loans to businesses with gross annual revenues of \$1 million or less was well below the percentage of those businesses but exceeded the aggregate percentage of all reporting lenders.

2022-2023

The percentage of small loans to businesses with gross annual revenues of \$1 million or less was well below the percentage of those businesses and below the aggregate percentage of all reporting lenders.

Consumer Loans

Refer to Table V in the state of Colorado section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The bank exhibits an excellent borrower distribution of consumer loans in the Denver MSA.

2021

The percentage of consumer loans to low-income households exceeded both the percentage of low-income households and the aggregate percentage of all reporting lenders. The percentage of consumer loans to moderate-income households exceeded both percentage of moderate-income households and the aggregate percentage of all reporting lenders. *2022-2023.*

The percentage of consumer loans to low-income households exceeded both the percentage of low-income households and the aggregate percentage of all reporting lenders. The percentage of consumer loans to moderate-income households exceeded both percentage of moderate-income households and the aggregate percentage of all reporting lenders.

Community Development Lending

The institution is a leader in making CD loans.

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 lending had a positive impact on the bank's overall lending performance in the Denver MSA. The bank originated three CD loans totaling \$15.1 million representing 25.6 percent of allocated tier 1

capital to the Denver AA. CD loans exhibited responsiveness to the credit and community needs in the AA. CD loans primarily supported economic development and community services.

Examples of CD loans originated during the evaluation period include:

- \$13.5 million loan to finance the construction of a community marketplace that would establish anchor businesses and promote job growth in the community.
- \$1.6 million loan to finance the purchase of a manufacturing facility that would promote economic development by providing permanent jobs.
- \$73 thousand letter of credit to assist with the expansion of an urgent care facility primarily serving LMI individuals.

The bank originated two CD loans in the Boulder MSA and two loans in the Colorado Springs MSA totaling \$3.7 million. Academy delineated the Boulder MSA as an AA in 2021 but not 2022-2023.

Product Innovation and Flexibility

The institution makes little use of innovative and/or flexible lending practices in order to serve AA credit needs. As mentioned in the Overall CRA Rating section above, the CBSCCP program was established to help build the credit history of low- or moderate-income individuals. During the evaluation period, Academy Bank in the State of Colorado they had 2,262 card holders with \$638 thousand in approved credit from the CBSCCP.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Boulder MSA, Colorado Springs MSA, Fort Collins MSA, Greeley MSA, Grand Junction MSA, and Pueblo MSA is consistent with the bank's overall performance under the Lending Test in the full-scope area.

Due to loan volume, an analysis of lending performance could not be conducted on home mortgage loans and small loans to businesses in the Boulder MSA, Fort Collins MSA, Grand Junction MSA, Greeley MSA, and Pueblo MSA. An analysis of lending performance could not be conducted on home mortgage loans in the Colorado Springs MSA.

Refer to Tables O through V in the state of Colorado section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

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

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

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Denver MSA	1	257	11	1,774	12	33.3	2,031	37.6	0	0
Limited-Scope										
Colorado Springs MSA	5	818	11	1,099	16	47.4	1,917	35.5	0	0
Boulder MSA	0	0	1	144	1	2.8	144	2.7	0	0
Fort Collins MSA	1	152	1	186	2	5.6	338	6.3	0	0
Grand Junction MSA	1	249	0	0	1	2.8	249	4.6	0	0
Greeley MSA	0	0	1	230	1	2.8	230	4.3	0	0
Pueblo MSA	1	260	1	88	2	5.6	348	6.4	0	0
CO Non-MSA	0	0	1	145	1	2.8	145	2.7	0	0
Totals	9	1,736	27	3,666	36	100.0	5,402	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.

Denver, CO MSA

Performance in the AA is adequate. Qualified investments totaled \$2 million, with current period investments totaling \$1.7 million, donations totaling \$22,240 and prior period investments totaling \$257,000. Total investments represent 3.44 percent of allocated tier 1 capital.

Examples of qualified investments in this AA include:

- A \$800,000 Freddie Mac multifamily bond for an affordable housing complex located in Denver, Colorado where 95 percent of the units are reserved for LMI individuals.
- Two \$5,000 donations to a nonprofit organization that provides food access and workforce development to LMI women.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Colorado Springs AA is stronger than the bank's overall performance under the Investment Test in the full-scope area due to investments and grants as a percentage of capital totaling 6.81 percent. Investments in the AA include MBS, multifamily pools and grants supporting nonprofit organizations provided community services to LMI individuals.

Based on limited-scope reviews, the bank's performance under the Investment Test in the Fort Collins AA is stronger than the bank's overall performance under the Investment Test in the full-scope area due to investments as a percentage of capital totaling 4.92 percent.

Based on limited-scope reviews, the bank's performance under the Investment Test in the Greely AA is stronger than the bank's overall performance under the Investment Test in the full-scope area due to investments as a percentage of capital totaling 5.17 percent.

Based on limited-scope reviews, the bank's performance under the Investment Test in the Pueblo AA is stronger than the bank's overall performance under the Investment Test in the full-scope area due to investments and grants as a percentage of capital totaling 4.04 percent.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the institution's AA. In Colorado, the bank has no branches that operate in a low-income census tract and 12 branches that operate in a moderate-income census tract. The 12 branches in a moderate-income census tract make up 46.2 percent of the total branches in Colorado. Eight of the branches located in a middle- or upper-income census tract are in close proximity to a low- or moderate-income census tract. In the Denver MSA, the distribution of branches in moderate-income geographies significantly exceeded demographics with 50.0 percent of the branches are in moderate-income geographies. This exceeds the percentage of the population living in moderate-income geographies with 18.0 of the population in moderate-income geographies. There are no branches in low-income tracts in the Denver MSA, which has only 6.1 percent of the population.

U.S. Census tract changes updated for the 2020 census resulted in two branches changing census tracts from 2021 to 2022 for one branch in the Fort Collins AA changing from moderate-income to middle-income and one in the Greely AA having the same change.

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Colorado Springs MSA	26.3	7	26.9	0.0	57.1	28.6	0.0	14.3	1.9	25.2	39.1	33.2	0.7
Denver MSA	55.1	12	46.2	0.0	50.0	16.7	33.3	0.0	6.1	31.3	35.6	26.0	1.1
Fort Collins MSA	6.4	2	7.7	0.0	50.0	50.0	0.0	0.0	1.7	18.3	61.4	18.7	0.0
Greeley MSA	4.1	2	7.7	0.0	50.0	50.0	0.0	0.0	3.8	22.2	42.6	31.0	0.5
Pueblo MSA	8.0	3	11.5	0.0	0.0	66.7	33.3	0.0	6.0	20.4	37.3	35.3	1.0

Academy offers additional services that provide for alternative delivery system to customers that includes deposit-taking ATMs, online banking, telephone banking, and mobile banking. Academy also participates in the Cash2Debit program in which customers can go to a variety of retailers such as Walmart, drug stores, or convenience stores and swipe their Academy Bank debit card and hand the cash to the cashier with the cash then added to their Academy account. There are 45 Cash2Debit locations within Academy's Colorado AAs: 26 in the Denver AA, nine in the Colorado Springs AA, four in the Fort Collins AA, four in the Pueblo AA, and two in the Greeley AA. Academy operates 30 deposit-taking ATMs in Colorado with 15 of them located in the Denver AA, eight in the Colorado Springs AA, three in the Pueblo AA, and two each in the Fort Collins and Greeley AAs. There are no deposit-taking ATMs in low-income tracts in Colorado. There are 13 deposit-taking ATMs located in moderate-income tracts with six in the Denver AA, five in the Colorado Springs AA, and one each in the Fort Collins and Greeley AAs. Six of the 30 ATMs in Colorado are ITMs which allow a direct interface with an actual human teller.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Boulder MSA	0	1	0	-1	0	0
Colorado Springs MSA	0	1	0	0	-1	0
Denver MSA	0	5	0	0	-3	-2
Grand Junction MSA	0	2	0	0	-2	0

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 low- and moderate-income geographies and/or to low- and moderate-income individuals. The Longmont, CO branch closed in 2022 and was

located in a moderate-income census tract. The next closest branch or deposit-taking ATM is over 16 miles away.

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

Academy Bank offers traditional retail banking products including checking and savings accounts. Academy Bank offers debit card and personal check processing services for its customers. Academy Bank also offers various consumer loans including personal loans and automobile loans.

Community Development Services

The institution provides a relatively high level of CD services.

The Denver MSA represents a good level of services during the assessment period. The only full-scope assessment area receiving consideration for the number of service hours is the Denver MSA. In the Denver MSA, eight employees and managers logged 186 hours of community development service to five different organizations, and had three unique leadership positions, i.e. board or chair seats. Notable example of service included volunteer work to develop financial literacy skills.

- Seven services totaling 106 hours focused on affordable housing with bank employees serving on boards for affordable housing initiatives.
- Five services totaling 17 hours focusing on community services providing financial literacy and a board for combating women’s poverty.
- Seven services totaling 63 hours that focus on economic development serving on boards and providing job training.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s performance under the Service Test in the Boulder MSA, Colorado Springs MSA, Fort Collins MSA, Greeley MSA, Grand Junction MSA, and Pueblo MSA is consistent with the bank’s overall performance under the Service Test in the full-scope area.

State Rating

State of Missouri

CRA rating for the State of Missouri⁴: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: Needs to Improve

The major factors that support this rating include:

- The bank exhibits an excellent geographic distribution of consumer loans in the Springfield, MO MSA.

⁴ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

- The bank makes an adequate level of CD Investments and demonstrates adequate responsiveness to community needs with investments and donations.
- The distribution of loans among borrowers of different income levels sizes in the Springfield, MO MSA is excellent.

Description of Institution’s Operations in Missouri

Academy delineated five AAs within the state of Missouri. The AAs include the Springfield, MO MSA which received a full-scope review, Columbia MSA (Boone County), St. Joseph MSA (Buchanan County), St. Louis MSA (St. Louis County), and the Missouri non-MSA AA (Johnson and Taney Counties) which all received limited-scope reviews. Academy operated 14 branches and 14 deposit-taking ATMs in Missouri with no branches and no deposit-taking ATMs in low-income CTs and four branches and four deposit-taking ATMs located in moderate-income CTs. Based on the FDIC Deposit Market Share Report as of June 30, 2023, Academy’s deposits in the state of Missouri totaled \$264 million, or 12.3 percent of the bank’s total deposits.

Springfield MSA

The Springfield AA was the only AA in the state of Missouri selected for a full-scope review. The Springfield AA includes portions the Springfield, MO MSA. The Springfield AA is comprised of the entire counties of Greene and Christian counties, two of the five counties that make up the Springfield, MO MSA (Springfield MSA). The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies.

Academy operated five branches within the Springfield AA, representing 6.8 percent of its total branches. The bank also operated five deposit-taking ATMs in this AA. This AA has five low-income, 21 moderate-income, 40 middle-income, 29 upper-income, and two unclassified CTs. Academy operated no branches and no deposit-taking ATMs in low-income census tracts (CTs) and two branches and two deposit-taking ATMs in moderate-income CTs.

Based on the FDIC Deposit Market Share Report as of June 30, 2023, Academy’s deposits in the AA totaled \$71.6 million, representing 3.5 percent of the bank’s total deposits. Deposit competition is strong. The FDIC Market Share report as of June 30, 2023, indicated there are 38 direct competitors operating 178 offices. Academy ranked 25th in the market with less than one percent of the deposit market share. The top three banks by deposit market share are Great Southern Bank, The Central Trust Bank, and Guaranty Bank.

The following tables provides a summary of the demographics that include housing, business, and farm information for the Springfield AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Springfield MSA AA – 2021						
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	30,109	2.7	24.4	52.4	20.1	0.4
Farms by Geography	1,049	2.1	11.2	63.7	23.0	0.0
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 Household Income: \$46,613			Median Gross Rent			\$712
Households Below Poverty Level: 16.2%			Families Below Poverty Level			11.7%
<i>Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Springfield MSA AA – 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	97	5.2	21.6	41.2	29.9	2.1
Population by Geography	387,757	4.3	18.0	45.5	31.5	0.7
Housing Units by Geography	169,241	4.9	20.2	45.0	29.1	0.8
Owner-Occupied Units by Geography	96,018	1.6	13.3	45.9	39.1	0.0
Occupied Rental Units by Geography	64,001	9.3	29.5	43.9	15.3	2.0
Vacant Units by Geography	9,222	8.2	27.2	42.7	20.6	1.4
Businesses by Geography	68,070	1.8	17.2	45.4	32.5	3.1
Farms by Geography	2,326	1.0	12.1	50.4	35.1	1.4
Family Distribution by Income Level	97,782	18.4	18.3	21.7	41.7	0.0
Household Distribution by Income Level	160,019	23.8	16.6	18.2	41.4	0.0
Median Family Income MSA - 44180 Springfield, MO MSA		\$64,545	Median Housing Value			\$154,677
Median Household Income: \$53,873			Median Gross Rent			\$788
Households Below Poverty Level: 15.3%			Families Below Poverty Level			8.5%
<i>Source: 2020 U.S. Census and 2023 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>						

Based on Table A (2022-2023) the Springfield AA has a population of 387,757, which includes approximately 160,019 households and 169,241 units, with 94.6 percent occupancy. The median housing value is \$154,677.

Examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the information in the above respective tables, low-income families earned less than \$27,474 (2021) or \$32,273 (2022-2023), and moderate-income families earned less than \$43,958 (2021) or \$51,636 (2022-2023). The median housing value in the AA is \$132,465 (2021) or \$154,677 (2022-2023). One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30.0 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was between \$687 (2021) or \$807 (2022-2023) for a low-income borrower and \$1,099 (2021) or \$1,291 (2022-2023) for a moderate-income borrower. Assuming a 30-year mortgage with a 5.0 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$711 (2021) or \$830 (2022-2023). Based on these calculations, low-income borrowers would be challenged to qualify for and afford home mortgage financing in this AA.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income

above the poverty level. For this AA, 11.7 percent (2021) and 8.5 (2022-2023) percent of families were living below the poverty level.

Employment and Economic Data

According to Moody's Analytics, Springfield's expansion is slowing. Employment has flattened and declines in manufacturing and sluggish transportation/warehousing growth have stunted the overall expansion in recent months. The analysis cites concerns over low incomes and worker productivity and below-average educational attainment despite presence of Missouri State University. Housing and rental prices trends continue to increase but cost of living is relatively low. The primary industries in the AA include healthcare, retail, education, and professional and business services. Some of the major employers in the area include Cox Health Systems, Mercy Health Springfield Community, Walmart, Bass Pro Shops, Missouri State University, Jack Henry and Associates Inc, and O'Reilly Auto Parts.

According to the U.S. Bureau of Labor Statistics, the unemployment rates for the Springfield MSA decreased from 4.6 percent in January 2021 to 2.3 percent in December 2023. The national unemployment rate was 3.7 percent in December 2023.

Community Contacts

As part of the CRA evaluation, the OCC reviewed information from a community contact within the Springfield AA to better understand area credit and community needs. Contact was performed in June 2022, with an organization focused on economic development whose primary goal of encouraging business attraction, retention, expansion, workforce development, and entrepreneurship. Contacts cited a need for affordable housing, viable employment opportunities, and commercial lending for new businesses.

Scope of Evaluation in Missouri

The Springfield AA was selected for a full-scope review out of the five total AAs in Missouri and has the greatest weight applied for the state analysis with the AA having five of the 14 branch locations in Missouri or 35.7 percent, 15 of the 30 deposit-taking ATMs, 32.5 percent of the bank branch deposits, and 49.6 percent of total bank loans by number for the evaluation period. The four other AAs received limited-scope reviews.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MISSOURI

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

2021

Number of Loans*								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Columbia MSA	1	2	0	0	193	196	9.6	5.4
Missouri Non-MSA	5	7	0	0	143	155	7.6	20.7
Springfield MSA	1	9	0	0	928	938	45.8	33.7
St Joseph MSA	6	2	0	0	589	597	29.2	18.9
St Louis MSA	1	12	0	0	147	160	7.8	21.2
TOTAL	14	32	0	0	2,000	2,046	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*								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Columbia MSA	281,330	47,000	0	0	170,000	498,330	6.9	5.4
Missouri Non-MSA	1,009,850	1,203,000	0	0	111,000	2,323,850	32.0	20.7
Springfield MSA	316,051	169,000	0	0	791,000	1,276,051	17.6	33.7
St Joseph MSA	1,118,899	78,000	0	0	503,000	1,699,899	23.4	18.9
St Louis MSA	1,220,000	126,000	0	0	112,000	1,458,000	20.1	21.2
TOTAL	3,946,130	1,623,000	0	0	1,687,000	7,256,130	100.0	100.0

Source: Bank Data; "--" data not available.
Due to rounding, totals may not equal 100.0%

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

2022-2023

Number of Loans*								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Columbia MSA	1	0	0	0	305	306	8.8	6.0
Missouri Non-MSA	4	10	0	0	419	433	12.5	20.5
Springfield MSA	3	0	0	0	1,585	1,588	45.8	32.5
St Joseph MSA	3	2	0	0	925	930	26.8	17.9
St Louis MSA	2	2	0	1	205	210	6.1	23.1
TOTAL	13	14	0	1	3,439	3,467	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*								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Columbia MSA	155,200	0	0	0	341,000	496,200	4.3	6.0
Missouri Non-MSA	422,869	4,122,000	0	0	566,000	5,110,869	44.0	20.5
Springfield MSA	403,919	0	0	0	2,112,000	2,515,919	21.7	32.5
St Joseph MSA	333,762	101,000	0	0	1,215,000	1,649,762	14.2	17.9
St Louis MSA	447,000	110,000	0	1,040,280	247,000	1,844,280	15.9	23.1
TOTAL	1,762,750	4,333,000	0	1,040,280	4,481,000	11,617,030	100.0	100.0
<i>Source: Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%</i>								

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

In 2023, in the Springfield, Missouri MSA, Academy Bank ranked 247th out of 319 institutions in the home mortgage lending market share by number of loans (0.01 percent), and 301st by dollar amount (0.01 percent). Market share information for mortgage loans shows Academy Bank operates in a highly competitive banking environment that includes specialized mortgage lending companies and larger state and nationwide banks. The top mortgage lenders in the Springfield, Missouri MSA are Flat Branch Mortgage, Inc., PennyMac Loan Services LLC, and Central Trust Bank.

For small loans to businesses in 2023, Academy did not originate any small loans to businesses in the Springfield, Missouri MSA. A significant amount of competition also exists within the AAs with the top lenders being American Express, Central Trust Bank, and JPMorgan Chase.

As evidenced by the above tables, consumer loans are the banks primary lending product by number.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of consumer loans in it the Springfield MSA. However, the bank did not originate a sufficient volume of home mortgage loans and business loans to conduct a meaningful analysis and finalize a conclusion.

Home Mortgage Loans

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.

2021

The bank did not originate a sufficient volume of loans to conduct a meaningful analysis.

2022-2023

The bank did not originate a sufficient volume of loans to conduct a meaningful analysis.

Small Loans to Businesses

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.

2021

The bank did not originate a sufficient volume of loans to conduct a meaningful analysis.

2022-2023

The bank did not originate a sufficient volume of loans to conduct a meaningful analysis.

Consumer Loans

Refer to Table U in the state of Missouri section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank’s consumer loan originations and purchases.

The bank exhibits an excellent geographic distribution of consumer loans in the Springfield, Missouri MSA.

2021

The percentage of consumer loans originated in low-income geographies exceeded the percentage of low-income households. The percentage of consumer loans originated in moderate-income geographies significantly exceeded the percentage of moderate-income households.

2022-2023

The percentage of consumer loans originated in low-income geographies exceeded the percentage of low-income households. The percentage of consumer loans originated in moderate-income geographies significantly exceeded the percentage of moderate-income households.

Lending Gap Analysis

Examiners analyzed Academy’s lending patterns and reviewed summary reports and maps of home mortgage loans, small loans to businesses, and consumer loans to identify any gaps in the geographic distribution of loans in the AA. Examiners focused on clusters of low- and moderate-income census tracts with no lending in the AA and evaluated those clusters to determine if demographic information, or other performance context data reflected lending opportunities within those clusters. Examiners did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of consumer loans among individuals of different income levels in the Springfield MSA. However, the bank did not originate a sufficient volume of home mortgage loans and business loans to conduct a meaningful analysis and finalize a conclusion.

Mortgage Loans

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.

2021

The bank did not originate a sufficient volume of loans to conduct a meaningful analysis.

2022-2023

The bank did not originate a sufficient volume of loans to conduct a meaningful analysis.

Small Loans to Businesses

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.

2021

The bank did not originate a sufficient volume of loans to conduct a meaningful analysis.

2022-2023

The bank did not originate a sufficient volume of loans to conduct a meaningful analysis.

Consumer Loans

Refer to Table V in the state of Missouri section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The bank exhibits an excellent borrower distribution of consumer loans in the Springfield, Missouri MSA.

2021

The percentage of consumer loans to low-income households exceeded the percentage of low-income households. The percentage of consumer loans to moderate-income households exceeded the percentage of moderate-income households.

2022-2023

The percentage of consumer loans to low-income households exceeded the percentage of low-income households. The percentage of consumer loans to moderate-income households exceeded the percentage of moderate-income households.

Community Development Lending

The institution has made few if any CD loans.

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 assessment period, Academy made no CD loans in the full scope AA of Springfield, Missouri. However, Academy made one CD loan located in the St. Louis MSA totaling \$1,040,280 or 10.2 percent of tier 1 capital allocated to the St. Louis MSA. The loan supported preserving existing jobs that included caring for the elderly, sick, and disabled adults.

Product Innovation and Flexibility

Academy Bank makes little use of innovative and flexible lending practices in order to serve AA credit needs. As mentioned in the Overall CRA Rating section above, the CBS CCP program was established to help build the credit history of low- or moderate-income individuals. During the evaluation period, Academy Bank in the State of Missouri they had 1,009 card holders with \$217 thousand in approved credit from the CBS CCP.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Columbia MSA, St. Joseph MSA, St. Louis MSA, and Missouri non-MSA is consistent with the bank's overall performance under the Lending Test in the full-scope area.

Due to loan volume, an analysis of lending performance could not be conducted on home mortgage loans and small loans to businesses in the Columbia MSA, Missouri Non-MSA, St. Joseph MSA, and St. Louis MSA.

Refer to Tables O through V in the state of Missouri section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

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

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

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Springfield MSA	3	443	3	237	6	26.1	680	29.0	0	0
Limited-Scope										
Missouri Non-MSA	3	408	2	174	5	21.7	582	25.0	0	0
Columbia MSA	1	102	2	351	3	13.1	453	19.4	0	0
St Joseph MSA	0	0	4	83	4	17.4	83	3.6	0	0
St Louis MSA	0	0	5	540	5	21.7	540	23.0	0	0
Totals	7	953	16	1,385	23	100.0	2,338	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.

Springfield, MO MSA

Performance in the AA is adequate. Qualified investments totaled \$680,000, with current period investments totaling \$237,000 and prior period investments totaling \$443,000. Total investments represent 4.73 percent of allocated tier 1 capital. Current period investments were made up of MBS, one donation and one prior period investment was to a CDFI.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Colombia AA is stronger than the bank's overall performance under the Investment Test in the full-scope area due to investments as a percentage of capital totaling 16.94 percent. Investments in the AA were MBS.

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 performance under the Investment Test in the full-scope area due to investments and grants as a percentage of capital totaling 1.04 percent.

Based on limited-scope reviews, the bank's performance under the Investment Test in the St. Louis AA is stronger than the bank's overall performance under the Investment Test in the full-scope area due to investments as a percentage of capital totaling 5.28 percent.

Based on limited-scope reviews, the bank's performance under the Investment Test in the MO Non-MSA AA is stronger than the bank's overall performance under the Investment Test in the full-scope area due to investments and grants as a percentage of capital totaling 6.42 percent.

SERVICE TEST

The bank’s performance under the Service Test in Missouri 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 Springfield 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. In Missouri, the bank has no branches that operate in a low-income census tract and four branches that operate in a moderate-income census tract. The four branches in a moderate-income census tract make up 30.8 percent of the total branches in Missouri. Five of the branches located in a middle- or upper-income census tract are in close proximity to a low- or moderate-income census tract. In the Springfield MSA, the distribution of branches in moderate-income geographies significantly exceeded demographics with 40.0 percent of the branches are in moderate-income geographies. This exceeds the percentage of the population living in low- and moderate-income geographies with 4.3 percent of the population in low-income and 18.0 of the population in moderate-income geographies.

Distribution of Branch Delivery System													
Assessment Area	Deposits % of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Branches Location of Branches by Income of Geographies (%)					Population % of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
				Columbia MSA	6.0	1	7.1	0.0	0.0	0.0	0.0	100.0	10.8
Missouri Non-MSA	20.5	3	21.4	0.0	33.3	0.0	66.7	0.0	0.0	13.5	60.2	26.3	0.0
Springfield MSA	32.5	5	35.7	0.0	40.0	60.0	0.0	0.0	4.3	18.0	45.5	31.5	0.7
St Joseph MSA	17.9	2	14.3	0.0	0.0	50.0	50.0	0.0	6.6	18.1	65.6	9.8	0.0
St Louis MSA	23.1	3	21.4	0.0	33.3	0.0	66.7	0.0	5.4	19.5	29.4	45.5	0.1

Academy offers additional services that provide for alternative delivery system to customers that includes deposit-taking ATMs, online banking, telephone banking, and mobile banking. Academy also participates in the Cash2Debit program in which customers can go to a variety of retailers such as Walmart, drug stores, or convenience stores and swipe their Academy Bank debit card and hand the cash to the cashier with the cash then added to their Academy account. There are 23 Cash2Debit locations within Academy’s Missouri AAs: 12 in the Springfield AA, four in the non-MSA AA, three in the Columbia AA, and two each in the St. Joseph and St. Louis AAs. Academy operates 14 deposit-taking ATMs in Missouri (outside of the Kansas City MMSA) with five of them located in the Springfield AA, one in the Columbia AA, and three each in the St. Joseph, St. Louis, and Non-MSA AAs. One of the 14 ATMs in Missouri is an ITM which allows a direct interface with an actual human teller.

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

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 low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank closed one branch in St. Louis, Missouri in 2022 which was in a moderate-income census tract. The next closest branch or deposit-taking ATM is over 10 miles away.

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

Academy Bank offers both traditional free standing bank locations with drive thru service and leased space inside Walmart store locations. Both types of locations offer checking and savings accounts, and various personal loans.

Community Development Services

The institution provides few if any CD services.

The only full-scope review area is the Springfield, Missouri MSA, and there were zero reported community service hours in the assessment area.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Columbia MSA, St. Joseph MSA, St. Louis MSA, and Missouri non-MSA is consistent with the bank's overall performance under the Service Test in the full-scope area.

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:	01/01/21 to 12/31/23	
Bank Products Reviewed:	Home mortgage, small business, and consumer loans Community development loans, qualified investments, and community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		
Kansas City, MO-KS MMSA	Full-scope	<u>Kansas</u> – Johnson and Wyandotte Counties <u>Missouri</u> – Cass, Clay, Jackson, Platte, and Ray Counties
State		
State of Arizona		
Phoenix MSA	Full-scope	Maricopa County
Tucson MSA	Limited-scope	Pima County
Yuma MSA	Limited-scope	Yuma County
State of Colorado		
Denver MSA	Full-scope	Adams, Arapahoe, Denver, and Jefferson Counties
Boulder MSA*	Limited-scope	Boulder County
Colorado Springs MSA	Limited-scope	El Paso County
Fort Collins MSA	Limited-scope	Larimer County
Grand Junction MSA*	Limited-scope	Mesa County
Greeley MSA	Limited-scope	Weld County
Pueblo MSA	Limited-scope	Pueblo County
State of Missouri		
Springfield MSA	Full-scope	Christian and Greene Counties
Columbia MSA	Limited-scope	Boone County
Missouri non-MSA	Limited-scope	Johnson, Taney, and Randolph Counties
St. Joseph MSA	Limited-scope	Buchanan County
St. Louis MSA	Limited-scope	St. Louis County

*Assessment area in 2021 only.

Appendix B: Summary of MMSA and State Ratings

RATINGS: ACADEMY BANK, N.A.				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Academy Bank	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
MMSA or State:				
Kansas City, MO-KS MMSA	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Arizona	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Colorado	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Missouri	Low Satisfactory	Low Satisfactory	Needs to Improve	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 U. Assessment Area Distribution of Consumer 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 households in those geographies.
- Table V. Assessment Area Distribution of Consumer 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 households by income level in each MMSA/assessment area.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Kansas City, MO-KS MMSA

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Kansas City, MO-KS MMSA	606	186,567,485	100.0	118,719	6.1	3.1	3.1	17.6	9.4	14.7	38.7	31.8	37.4	37.4	55.6	44.6	0.2	0.0	0.2
Total	606	186,567,485	100.0	118,719	6.1	3.1	3.1	17.6	9.4	14.7	38.7	31.8	37.4	37.4	55.6	44.6	0.2	0.0	0.2

*Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-23
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Kansas City, MO-KS MMSA	216	83,888,782	100.0	47,989	4.5	2.3	4.6	20.1	15.7	21.7	40.1	28.2	38.7	34.9	52.8	34.5	0.4	0.9	0.4
Total	216	83,888,782	100.0	47,989	4.5	2.3	4.6	20.1	15.7	21.7	40.1	28.2	38.7	34.9	52.8	34.5	0.4	0.9	0.4

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Kansas City, MO-KS MMSA	606	186,567,485	100.0	118,719	21.3	4.0	7.5	17.4	15.2	17.8	20.2	19.1	20.2	41.1	53.1	34.6	0.0	8.6	19.9
Total	606	186,567,485	100.0	118,719	21.3	4.0	7.5	17.4	15.2	17.8	20.2	19.1	20.2	41.1	53.1	34.6	0.0	8.6	19.9

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022-23
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Kansas City, MO-KS MMSA	216	83,888,782	100.0	47,989	20.3	2.8	9.1	17.4	15.3	19.9	21.6	16.2	20.3	40.7	50.9	32.5	0.0	14.8	18.1
Total	216	83,888,782	100.0	47,989	20.3	2.8	9.1	17.4	15.3	19.9	21.6	16.2	20.3	40.7	50.9	32.5	0.0	14.8	18.1

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2021**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Kansas City, MO-KS MMSA	438	47,394	100.0	48,173	7.3	7.5	6.9	18.7	18.3	18.4	33.6	27.6	32.2	38.4	42.2	40.3	1.9	4.3	2.1
Total	438	47,394	100.0	48,173	7.3	7.5	6.9	18.7	18.3	18.4	33.6	27.6	32.2	38.4	42.2	40.3	1.9	4.3	2.1

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 Dollar amounts for loans are multiplied by 1000.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022-23**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Kansas City, MO-KS MMSA	211	58,593	100.0	46,439	5.7	5.7	5.3	23.3	21.8	19.1	34.0	26.5	33.2	34.4	34.6	39.9	2.6	11.4	2.6
Total	211	58,593	100.0	46,439	5.7	5.7	5.3	23.3	21.8	19.1	34.0	26.5	33.2	34.4	34.6	39.9	2.6	11.4	2.6

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 Dollar amounts for loans are multiplied by 1000.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Kansas City, MO-KS MMSA	438	47,394	100.0	48,173	85.5	62.3	47.3	4.9	20.5	9.7	17.1
Total	438	47,394	100.0	48,173	85.5	62.3	47.3	4.9	20.5	9.7	17.1

*Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%
Dollar amounts for loans are multiplied by 1000.*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-23
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Kansas City, MO-KS MMSA	211	58,593	100.0	46,439	91.3	34.6	51.8	2.7	51.7	6.0	13.7
Total	211	58,593	100.0	46,439	91.3	34.6	51.8	2.7	51.7	6.0	13.7

*Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%
Dollar amounts for loans are multiplied by 1000.*

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2021	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Kansas City, MO-KS MMSA	3,259	6,437	100.0	9.9	12.0	22.1	35.3	37.6	39.5	30.1	12.8	0.4	0.4	
<i>Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0% Dollar amounts for loans are multiplied by 1000.</i>														

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2022-23	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Kansas City, MO-KS MMSA	5,349	15,767	100.0	7.4	8.4	24.6	38.0	38.4	40.6	28.8	12.1	0.8	1.0	
<i>Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data. Due to rounding, totals may not equal 100.0% Dollar amounts for loans are multiplied by 1000.</i>														

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower **2021**

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Kansas City, MO-KS MMSA	3,259	6,437	100.0	23.5	54.3	16.6	31.3	17.6	11.3	42.2	3.2	0.0	0.0
Total	3,259	6,437	100.0	23.5	54.3	16.6	31.3	17.6	11.3	42.2	3.2	0.0	0.0

*Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data.
 Due to rounding, totals may not equal 100.0%
 Dollar amounts for loans are multiplied by 1000.*

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower **2022-23**

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Kansas City, MO-KS MMSA	5,349	15,767	100.0	23.6	55.2	16.3	28.3	18.0	10.2	42.0	6.2	0.0	0.1
Total	5,349	15,767	100.0	23.6	55.2	16.3	28.3	18.0	10.2	42.0	6.2	0.0	0.1

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data.
 Due to rounding, totals may not equal 100.0%
 Dollar amounts for loans are multiplied by 1000.*

Arizona

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2021
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	14	3,568,989	87.5	383,319	4.6	7.1	3.6	18.8	14.3	14.4	34.7	28.6	34.9	41.9	50.0	46.6	0.0	0.0	0.5
Tucson MSA	2	464,221	12.5	74,128	4.7	0.0	3.2	21.4	50.0	15.5	32.9	0.0	31.9	41.0	50.0	49.4	0.0	0.0	0.0
Yuma MSA	0	0	0.0	12,373	0.0	0.0	0.0	25.7	0.0	15.7	47.0	0.0	40.6	27.3	0.0	43.7	0.0	0.0	0.0
Total	16	4,033,210	100.0	469,820	4.4	6.3	3.4	19.7	18.8	14.6	34.8	25.0	34.6	41.1	50.0	47.0	0.0	0.0	0.4

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-23
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	52	27,949,484	96.3	109,831	2.6	0.0	2.2	20.6	15.4	17.8	34.7	11.5	36.9	41.9	73.1	43.1	0.1	0.0	0.1
Tucson MSA	2	782,350	3.7	24,659	2.0	0.0	1.8	26.3	50.0	20.8	30.5	0.0	30.9	40.4	50.0	46.0	0.8	0.0	0.5
Yuma MSA	0	0	0.0	4,143	0.8	0.0	0.4	18.0	0.0	13.2	49.4	0.0	36.9	31.4	0.0	47.0	0.3	0.0	2.6
Total	54	28,731,834	100.0	138,633	2.4	0.0	2.0	21.7	16.7	18.2	34.4	11.1	35.9	41.2	72.2	43.7	0.3	0.0	0.2

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Phoenix MSA	14	3,568,989	87.5	383,319	21.8	0.0	5.2	16.9	21.4	16.0	19.2	14.3	20.1	42.2	64.3	40.2	0.0	0.0	18.5
Tucson MSA	2	464,221	12.5	74,128	22.2	0.0	5.1	17.3	0.0	14.2	19.1	0.0	19.4	41.4	0.0	36.2	0.0	100.0	25.1
Yuma MSA	0	0	0.0	12,373	20.0	0.0	1.9	19.1	0.0	11.1	19.6	0.0	18.2	41.3	0.0	39.4	0.0	0.0	29.3
Total	16	4,033,210	100.0	469,820	21.8	0.0	5.1	17.1	18.8	15.6	19.2	12.5	20.0	42.0	56.3	39.5	0.0	12.5	19.8

*Source: 2015 ACS ; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022-23
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Phoenix MSA	52	27,949,484	96.3	109,831	20.4	1.9	4.4	17.9	13.5	14.8	20.0	17.3	22.2	41.7	65.4	40.1	0.0	1.9	18.5
Tucson MSA	2	782,350	3.7	24,659	21.9	0.0	4.5	17.4	50.0	15.8	19.6	0.0	23.1	41.2	50.0	35.4	0.0	0.0	21.1
Yuma MSA	0	0	0.0	4,143	22.1	0.0	3.7	17.4	0.0	13.2	19.9	0.0	23.9	40.6	0.0	39.1	0.0	0.0	20.1
Total	54	28,731,834	100.0	138,633	20.7	1.9	4.4	17.8	14.8	15.0	19.9	16.7	22.4	41.6	64.8	39.2	0.0	1.9	19.1

*Source: 2020 U.S. Census ; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2021**

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	122	23,632	91.0	133,594	7.0	9.0	6.6	15.2	30.3	16.2	29.5	23.8	27.7	47.8	36.1	48.9	0.5	0.8	0.7
Tucson MSA	7	2,509	5.2	20,604	6.0	0.0	7.0	22.1	42.9	24.2	28.5	14.3	28.8	42.4	42.9	39.0	1.0	0.0	1.0
Yuma MSA	5	351	3.7	2,836	0.0	0.0	0.0	27.8	60.0	30.6	38.7	20.0	38.1	33.5	20.0	31.3	0.0	0.0	0.0
Total	134	26,492	100.0	157,034	6.8	8.2	6.5	16.3	32.1	17.5	29.5	23.1	28.0	46.8	35.8	47.3	0.6	0.7	0.7

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%.
 Dollar amounts for loans are multiplied by 1000.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022-23**

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	34	9,961	89.5	134,276	4.0	8.8	3.6	18.2	11.8	17.8	28.5	32.4	28.6	48.8	47.1	49.3	0.5	0.0	0.7
Tucson MSA	4	915	10.5	20,512	2.1	0.0	2.6	24.8	0.0	27.9	26.2	25.0	28.4	44.9	75.0	39.1	2.0	0.0	2.0
Yuma MSA	0	0	0.0	2,943	0.5	0.0	0.5	29.3	0.0	27.1	37.1	0.0	37.6	32.6	0.0	34.4	0.5	0.0	0.4
Total	38	10,986	100.0	157,731	3.7	7.9	3.4	19.3	10.5	19.3	28.3	31.6	28.8	48.0	50.0	47.7	0.7	0.0	0.8

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%.
 Dollar amounts for loans are multiplied by 1000.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2021
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	122	23,632	91.0	133,594	92.1	50.0	48.0	1.8	34.4	6.1	15.6	
Tucson MSA	7	2,509	5.2	20,604	90.2	28.6	48.7	2.2	57.1	7.5	14.3	
Yuma MSA	5	351	3.7	2,836	86.1	60.0	46.3	3.2	20.0	10.7	20.0	
Total	134	26,492	100.0	157,034	91.8	49.3	48.1	1.9	35.1	6.3	15.7	

*Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%
Dollar amounts for loans are multiplied by 1000.*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2022-23
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	34	9,961	89.5	134,276	93.8	29.4	54.2	1.4	70.6	4.8	0.0	
Tucson MSA	4	1,025	10.5	20,512	92.7	0.0	55.4	1.6	75.0	5.7	25.0	
Yuma MSA	--	--	--	2,943	89.6	--	52.1	2.2	--	8.2	--	
Total	38	10,986	100.0	157,731	93.6	26.3	54.3	1.4	71.1	5.0	2.6	

*Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%
Dollar amounts for loans are multiplied by 1000.*

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography														2021
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Phoenix MSA	393	307	44.5	9.5	24.9	23.0	33.3	33.3	32.1	34.0	9.7	0.1	0.0	
Tucson MSA	157	131	17.8	8.7	14.0	26.9	45.2	31.5	36.3	32.9	4.5	0.1	0.0	
Yuma MSA	334	164	37.8	0.0	0.0	30.1	43.4	44.2	40.1	25.7	16.5	0.0	0.0	
Total	884	602	100.0	9.0	13.6	24.1	39.3	33.3	35.9	33.5	11.3	0.1	0.0	

*Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%
Dollar amounts for loans are multiplied by 1000.*

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography														2022-23
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Phoenix MSA	579	738	44.7	5.3	14.0	26.2	45.3	33.6	33.7	34.6	4.8	0.3	2.2	
Tucson MSA	205	243	15.8	3.5	11.7	32.8	61.0	29.4	17.1	33.3	8.8	1.0	1.5	
Yuma MSA	510	500	39.4	1.2	1.0	23.7	32.0	48.5	45.1	26.3	21.8	0.3	0.2	
Total	1,294	1,481	100.0	4.8	8.5	27.4	42.5	33.3	35.5	34.0	12.1	0.5	1.3	

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data.
Due to rounding, totals may not equal 100.0%
Dollar amounts for loans are multiplied by 1000.*

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2021	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Phoenix MSA	393	307	44.5	23.3	44.8	16.3	35.9	17.7	13.0	42.7	6.4	0.0	0.0	
Tucson MSA	157	131	17.8	24.7	53.5	16.1	27.4	16.9	14.7	42.3	4.5	0.0	0.0	
Yuma MSA	334	164	37.8	22.0	30.8	17.8	40.1	18.8	19.5	41.5	9.3	0.0	0.3	
Total	884	602	100.0	23.5	41.1	16.3	36.0	17.6	15.7	42.6	7.1	0.0	0.1	

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data.
 Due to rounding, totals may not equal 100.0%
 Dollar amounts for loans are multiplied by 1000.

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2022-23	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Phoenix MSA	579	738	44.7	22.3	51.5	16.9	30.2	18.5	11.7	42.3	6.6	0.0	0.0	
Tucson MSA	205	243	15.8	24.1	44.4	16.2	38.0	17.4	10.2	42.4	7.3	0.0	0.0	
Yuma MSA	510	500	39.4	24.3	33.3	16.7	33.7	17.9	18.4	41.1	14.5	0.0	0.0	
Total	1,294	1,481	100.0	22.7	43.2	16.8	32.8	18.2	14.1	42.3	9.8	0.0	0.0	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data.
 Due to rounding, totals may not equal 100.0%
 Dollar amounts for loans are multiplied by 1000.

Colorado

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2021
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
Boulder MSA	3	2,854,350	4.4	25,137	3.0	0.0	3.4	18.0	0.0	16.8	45.6	66.7	47.1	33.3	33.3	32.7	0.0	0.0	0.0
Colorado Springs MSA	12	4,340,032	17.6	71,262	3.3	0.0	2.3	20.7	16.7	17.3	42.2	25.0	43.6	33.8	58.3	36.8	0.0	0.0	0.0
Denver MSA	43	21,516,637	63.2	219,797	5.6	2.3	5.5	22.6	18.6	22.1	36.4	30.2	36.0	35.5	48.8	36.4	0.0	0.0	0.0
Fort Collins MSA	6	2,324,523	8.8	32,434	1.5	0.0	1.8	20.5	66.7	20.0	52.7	0.0	46.8	25.2	33.3	31.4	0.0	0.0	0.0
Grand Junction MSA	0	0	0.0	13,747	0.0	0.0	0.0	19.1	0.0	18.4	58.3	0.0	60.9	22.7	0.0	20.7	0.0	0.0	0.0
Greeley MSA	4	1,398,534	5.9	34,073	3.5	0.0	2.1	19.9	25.0	15.0	40.5	50.0	35.9	36.0	25.0	47.0	0.0	0.0	0.0
Pueblo MSA	0	0	0.0	11,404	3.5	0.0	2.5	23.6	0.0	21.3	30.7	0.0	24.4	42.2	0.0	51.9	0.0	0.0	0.0
Total	68	32,434,076	100.0	407,854	4.3	1.5	3.9	21.5	22.1	20.1	40.2	29.4	39.4	34.0	47.1	36.6	0.0	0.0	0.0

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2022-23**

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	1	777,000	4.8	22,316	1.3	0.0	1.7	19.7	0.0	18.6	41.9	0.0	40.4	37.0	100.0	39.2	0.3	0.0	0.1
Denver MSA	16	9,469,149	76.2	62,536	3.5	0.0	3.4	24.9	31.3	26.7	40.1	50.0	39.5	30.9	18.8	29.8	0.6	0.0	0.6
Fort Collins MSA	2	879,647	9.5	9,598	0.3	0.0	0.2	14.8	0.0	13.1	64.3	100.0	60.9	20.5	0.0	25.7	0.1	0.0	0.0
Greeley MSA	1	508,261	4.8	11,407	1.5	0.0	1.0	17.5	0.0	15.0	47.2	0.0	40.5	33.9	100.0	43.5	0.0	0.0	0.0
Pueblo MSA	1	183,302	4.8	4,781	4.4	100.0	4.4	15.5	0.0	17.1	38.1	0.0	37.9	42.1	0.0	40.6	0.0	0.0	0.0
Total	21	11,817,359	100.0	110,638	2.7	4.8	2.6	22.0	23.8	22.3	43.2	47.6	41.6	31.8	23.8	33.2	0.4	0.0	0.4

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2021**

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
Boulder MSA	3	2,854,350	4.4	25,137	22.3	33.3	8.6	17.0	0.0	16.8	19.9	0.0	20.9	40.8	66.7	40.7	0.0	0.0	13.0
Colorado Springs MSA	12	4,340,032	17.6	71,262	20.4	16.7	4.1	18.5	8.3	14.5	20.3	25.0	20.7	40.8	25.0	32.8	0.0	25.0	27.8
Denver MSA	43	21,516,637	63.2	219,797	23.6	9.3	8.7	18.7	20.9	20.4	20.6	14.0	22.2	37.1	48.8	30.9	0.0	7.0	17.9
Fort Collins MSA	6	2,324,523	8.8	32,434	20.5	0.0	6.6	17.2	0.0	17.7	22.6	16.7	22.5	39.6	50.0	34.9	0.0	33.3	18.3
Grand Junction MSA	0	0	0.0	13,747	21.6	0.0	7.0	18.0	0.0	19.5	19.9	0.0	21.3	40.5	0.0	32.2	0.0	0.0	20.0
Greeley MSA	4	1,398,534	5.9	34,073	20.6	25.0	5.3	18.4	25.0	18.8	21.0	25.0	26.1	39.9	25.0	30.7	0.0	0.0	19.1
Pueblo MSA	0	0	0.0	11,404	22.6	0.0	5.0	17.6	0.0	16.1	18.7	0.0	23.2	41.1	0.0	37.9	0.0	0.0	17.7
Total	68	32,434,076	100.0	407,854	22.4	11.8	7.3	18.3	16.2	18.6	20.6	16.2	22.2	38.7	44.1	32.4	0.0	11.8	19.5

Source: 2015 ACS ; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022-23	
	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	
Colorado Springs MSA	1	777,000	4.8	22,316	18.9	0.0	4.3	18.6	0.0	17.0	21.9	0.0	27.0	40.6	100.0	36.1	0.0	0.0	15.6	
Denver MSA	16	9,469,149	76.2	62,536	22.3	6.3	6.5	19.3	12.5	20.0	22.0	50.0	25.2	36.4	18.8	33.3	0.0	12.5	15.0	
Fort Collins MSA	2	879,647	9.5	9,598	19.2	0.0	5.8	18.3	0.0	15.9	23.6	0.0	24.3	38.9	50.0	38.6	0.0	50.0	15.5	
Greeley MSA	1	508,261	4.8	11,407	19.5	0.0	4.6	18.0	0.0	17.5	22.7	100.0	30.0	39.8	0.0	33.1	0.0	0.0	14.8	
Pueblo MSA	1	183,302	4.8	4,781	22.4	0.0	6.4	16.7	100.0	21.2	19.3	0.0	25.4	41.6	0.0	32.0	0.0	0.0	14.9	
Total	21	11,817,359	100.0	110,638	21.1	4.8	5.8	18.9	14.3	18.8	22.1	42.9	26.0	37.9	23.8	34.2	0.0	14.3	15.1	

Source: 2020 U.S. Census ; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2021**

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
Boulder MSA	16	2,659	4.3	14,228	3.8	0.0	3.9	27.7	31.3	28.8	38.7	37.5	38.3	29.8	31.3	28.9	0.0	0.0	0.0
Colorado Springs MSA	141	10,424	38.3	17,565	6.9	5.7	7.4	23.2	25.5	22.6	34.1	32.6	32.5	35.7	34.8	37.4	0.1	1.4	0.0
Denver MSA	179	19,204	48.6	85,766	8.0	10.6	9.1	22.2	15.1	22.2	32.5	34.1	31.7	36.9	39.1	36.7	0.4	1.1	0.4
Fort Collins MSA	7	594	1.9	12,421	3.1	0.0	4.7	26.8	42.9	26.6	42.2	57.1	40.0	27.9	0.0	28.8	0.0	0.0	0.0
Grand Junction MSA	2	72	0.5	4,391	0.0	0.0	0.0	17.5	50.0	16.5	56.2	50.0	57.7	26.3	0.0	25.8	0.0	0.0	0.0
Greeley MSA	16	1,333	4.3	9,423	6.1	6.3	5.0	16.0	25.0	15.4	37.3	31.3	36.6	40.6	37.5	43.1	0.0	0.0	0.0
Pueblo MSA	7	237	1.9	2,703	3.1	14.3	2.4	26.2	14.3	23.5	28.9	42.9	27.7	41.5	28.6	46.3	0.4	0.0	0.0
Total	368	34,523	100.0	146,497	6.6	7.9	7.4	22.9	20.9	22.6	34.9	34.2	34.2	35.3	35.9	35.6	0.3	1.1	0.2

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Dollar amounts for loans are multiplied by 1000.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022-23**

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	25	6,600	38.5	18,869	1.4	0.0	1.1	26.6	48.0	25.8	36.1	4.0	34.5	35.3	48.0	38.0	0.6	0.0	0.6
Denver MSA	40	13,159	61.5	81,390	4.7	17.5	5.5	25.7	22.5	25.8	32.5	15.0	32.7	33.0	42.5	32.8	4.0	2.5	3.2
Fort Collins MSA	0	0	0.0	11,166	0.5	0.0	0.4	15.1	0.0	15.3	64.8	0.0	62.6	19.5	0.0	21.7	0.0	0.0	0.0
Greeley MSA	0	0	0.0	9,470	3.3	0.0	2.9	16.3	0.0	14.7	42.8	0.0	42.3	37.7	0.0	40.0	0.0	0.0	0.0
Pueblo MSA	0	0	0.0	2,871	3.8	0.0	3.0	23.1	0.0	20.9	34.2	0.0	31.1	38.6	0.0	44.9	0.3	0.0	0.1
Total	65	19,759	100.0	123,766	3.7	10.8	4.1	24.3	32.3	23.9	36.5	10.8	36.3	32.6	44.6	33.4	2.8	1.5	2.2

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 Dollar amounts for loans are multiplied by 1000.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2021
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	
Boulder MSA	16	2,659	4.3	14,228	92.8	50.0	48.2	2.3	18.8	4.9	31.3	
Colorado Springs MSA	141	10,424	38.3	17,565	92.6	66.7	54.4	1.9	14.9	5.5	18.4	
Denver MSA	179	19,204	48.6	85,766	92.2	64.2	47.2	2.5	18.4	5.3	17.3	
Fort Collins MSA	7	594	1.9	12,421	92.6	71.4	48.0	2.0	28.6	5.4	0.0	
Grand Junction MSA	2	72	0.5	4,391	90.6	100.0	54.3	2.5	0.0	6.9	0.0	
Greeley MSA	16	1,333	4.3	9,423	92.4	68.8	47.1	2.3	6.3	5.4	25.0	
Pueblo MSA	7	237	1.9	2,703	89.5	100.0	54.8	2.5	0.0	8.0	0.0	
Total	368	34,523	100.0	146,497	92.3	65.8	48.6	2.4	16.3	5.4	17.9	

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%
Dollar amounts for loans are multiplied by 1000.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2022-23
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	25	6,600	38.5	18,869	94.6	12.0	60.1	1.2	76.0	4.2	12.0	
Denver MSA	40	13,159	61.5	81,390	94.2	37.5	53.7	1.7	45.0	4.1	17.5	
Fort Collins MSA	--	--	--	11,166	94.0	--	56.3	1.4	--	4.6	--	
Greeley MSA	--	--	--	9,470	94.2	--	53.2	1.5	--	4.3	--	
Pueblo MSA	--	--	--	2,871	92.0	--	58.2	1.7	--	6.3	--	
Total	65	19,759	100.0	123,766	94.2	27.7	55.0	1.6	56.9	4.2	15.4	

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%
Dollar amounts for loans are multiplied by 1000.

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography **2021**

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Boulder MSA	79	67	1.8	7.1	15.2	22.5	49.4	43.4	24.1	27.0	11.4	0.0	0.0
Colorado Springs MSA	769	694	17.3	5.1	11.6	28.5	44.1	39.5	36.2	26.9	8.2	0.0	0.0
Denver MSA	2,158	1,742	48.6	9.5	17.9	27.3	42.8	35.2	28.3	27.9	11.0	0.0	0.0
Fort Collins MSA	253	242	5.7	2.0	7.1	28.5	34.8	49.2	45.1	20.3	13.0	0.0	0.0
Grand Junction MSA	193	164	4.4	0.0	0.0	24.2	30.6	56.4	59.1	19.4	10.4	0.0	0.0
Greeley MSA	522	468	11.8	9.5	18.0	22.3	38.5	39.3	33.0	28.9	10.2	0.0	0.4
Pueblo MSA	463	436	10.4	5.6	8.2	30.9	40.2	30.9	29.2	32.6	22.2	0.0	0.2
Total	4,437	3,813	100.0	7.6	14.4	26.9	41.4	38.5	32.5	27.0	11.7	0.0	0.1

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data.

Due to rounding, totals may not equal 100.0%

Dollar amounts for loans are multiplied by 1000.

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography **2022-23**

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Colorado Springs MSA	1,195	1,858	18.4	2.1	4.7	27.3	49.8	40.5	35.8	29.7	9.0	0.3	0.8
Denver MSA	3,088	4,797	47.6	5.9	11.2	30.5	52.2	36.8	26.9	25.4	9.2	1.3	0.5
Fort Collins MSA	423	1,099	6.5	1.8	1.2	17.7	28.8	64.6	61.9	15.9	8.0	0.1	0.0
Greeley MSA	921	1,230	14.2	3.7	11.7	23.3	43.2	44.0	37.6	29.0	7.4	0.0	0.1
Pueblo MSA	855	1,083	13.2	6.6	11.9	21.1	26.8	38.7	40.5	33.5	20.8	0.0	0.0
Total	6,482	10,067	100.0	4.8	9.5	27.9	45.6	40.5	34.2	25.9	10.3	0.9	0.4

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data.
 Due to rounding, totals may not equal 100.0%
 Dollar amounts for loans are multiplied by 1000.*

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2021	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Boulder MSA	79	67	1.8	26.0	69.6	15.4	25.3	15.8	3.8	42.8	1.3	0.0	0.0	
Colorado Springs MSA	769	694	17.3	22.7	50.7	16.7	32.1	19.0	11.4	41.6	5.7	0.0	0.0	
Denver MSA	2,158	1,742	48.6	25.3	64.6	17.5	27.2	18.6	7.0	38.6	1.1	0.0	0.0	
Fort Collins MSA	253	242	5.7	24.6	61.7	16.2	31.6	17.7	6.3	41.5	0.4	0.0	0.0	
Grand Junction MSA	193	164	4.4	23.7	42.5	16.7	33.2	18.1	16.1	41.6	8.3	0.0	0.0	
Greeley MSA	522	468	11.8	23.3	53.8	16.6	31.4	19.1	12.3	41.1	2.5	0.0	0.0	
Pueblo MSA	463	436	10.4	24.1	30.9	16.3	39.5	16.9	17.7	42.7	11.7	0.0	0.2	
Total	4,437	3,813	100.0	24.7	56.4	17.0	30.3	18.3	9.8	40.0	3.4	0.0	0.0	
<i>Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0% Dollar amounts for loans are multiplied by 1000.</i>														

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2022-23	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Colorado Springs MSA	1,195	1,858	18.4	22.7	56.6	16.5	25.4	19.2	10.7	41.5	7.3	0.0	0.0	
Denver MSA	3,088	4,797	47.6	24.2	63.7	18.0	25.3	19.3	6.4	38.6	4.7	0.0	0.0	
Fort Collins MSA	423	1,099	6.5	24.2	69.0	16.0	19.6	18.8	7.3	41.0	3.8	0.0	0.2	
Greeley MSA	921	1,230	14.2	23.1	57.5	16.7	26.0	19.0	11.5	41.2	5.0	0.0	0.0	
Pueblo MSA	855	1,083	13.2	25.0	34.9	15.5	34.2	17.8	16.7	41.7	14.3	0.0	0.0	
Total	6,482	10,067	100.0	23.9	58.0	17.4	26.2	19.1	9.3	39.6	6.4	0.0	0.0	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data.
 Due to rounding, totals may not equal 100.0%
 Dollar amounts for loans are multiplied by 1000.

Missouri

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2021
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	1	281,330	7.1	9,437	1.6	0.0	1.6	8.3	0.0	9.1	56.2	0.0	57.0	33.5	100.0	31.8	0.4	0.0	0.5
Missouri Non-MSA	5	1,009,850	35.7	6,214	0.0	0.0	0.0	8.3	0.0	5.6	66.1	60.0	65.0	25.6	40.0	29.4	0.0	0.0	0.0
Springfield MSA	1	316,051	7.1	24,099	2.7	0.0	2.2	12.8	0.0	11.2	58.7	0.0	60.9	25.7	100.0	25.7	0.0	0.0	0.0
St Joseph MSA	6	1,118,899	42.9	3,295	0.9	0.0	0.7	22.8	0.0	19.0	48.9	83.3	49.6	27.4	16.7	30.7	0.0	0.0	0.0
St Louis MSA	1	1,220,000	7.1	63,813	3.4	0.0	0.9	19.0	0.0	13.0	29.7	0.0	28.2	47.8	100.0	57.8	0.1	0.0	0.0
Total	14	3,946,130	100.0	106,858	2.8	0.0	1.2	16.4	0.0	12.0	40.9	57.1	40.9	39.9	42.9	45.8	0.1	0.0	0.1

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2022-23**

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	1	155,200	7.7	3,983	1.1	0.0	1.2	19.5	100.0	21.9	43.6	0.0	43.4	35.3	0.0	33.1	0.5	0.0	0.3
Missouri Non-MSA	4	422,869	30.8	3,219	0.0	0.0	0.0	7.9	0.0	11.4	64.2	100.0	58.6	27.9	0.0	30.1	0.0	0.0	0.0
Springfield MSA	3	403,920	23.1	10,603	1.6	0.0	2.0	13.3	100.0	17.5	45.9	0.0	45.6	39.1	0.0	34.8	0.0	0.0	0.1
St Joseph MSA	3	333,762	23.1	1,809	3.8	0.0	4.5	17.3	100.0	22.0	67.5	0.0	64.8	11.4	0.0	8.7	0.0	0.0	0.0
St Louis MSA	2	447,000	15.4	22,611	3.6	0.0	3.5	16.6	0.0	17.6	29.4	0.0	31.4	50.2	100.0	47.4	0.1	0.0	0.0
Total	13	1,762,751	100.0	42,225	2.7	0.0	2.7	15.6	53.8	17.7	38.1	30.8	39.6	43.4	15.4	39.9	0.1	0.0	0.1

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2021
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	1	281,330	7.1	9,437	21.0	0.0	6.8	17.1	0.0	16.8	22.0	0.0	17.6	39.9	0.0	33.1	0.0	100.0	25.6
Missouri Non-MSA	5	1,009,850	35.7	6,214	17.3	20.0	2.6	17.1	0.0	11.5	21.5	0.0	17.1	44.1	80.0	39.3	0.0	0.0	29.6
Springfield MSA	1	316,051	7.1	24,099	19.6	0.0	5.0	18.3	0.0	15.6	20.9	0.0	18.4	41.3	0.0	32.9	0.0	100.0	28.2
St Joseph MSA	6	1,118,899	42.9	3,295	22.3	0.0	7.5	17.2	50.0	21.5	24.0	33.3	19.5	36.4	16.7	28.9	0.0	0.0	22.6
St Louis MSA	1	1,220,000	7.1	63,813	19.4	0.0	7.8	16.2	0.0	15.3	18.6	0.0	16.9	45.8	100.0	38.1	0.0	0.0	21.9
Total	14	3,946,130	100.0	106,858	19.6	7.1	6.7	16.8	21.4	15.5	19.8	14.3	17.4	43.8	42.9	36.3	0.0	14.3	24.1

Source: 2015 ACS ; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2022-23**

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	1	155,200	7.7	3,983	18.2	0.0	8.5	18.9	100.0	18.5	20.9	0.0	21.1	42.0	0.0	29.6	0.0	0.0	22.3
Missouri Non-MSA	4	422,869	30.8	3,219	15.9	50.0	4.6	17.3	0.0	14.4	22.5	0.0	21.1	44.4	25.0	36.3	0.0	25.0	23.6
Springfield MSA	3	403,920	23.1	10,603	18.4	33.3	8.6	18.3	33.3	18.6	21.7	0.0	20.3	41.7	0.0	28.8	0.0	33.3	23.8
St Joseph MSA	3	333,762	23.1	1,809	20.8	33.3	11.3	19.4	33.3	26.0	20.8	0.0	18.3	39.0	33.3	22.2	0.0	0.0	22.3
St Louis MSA	2	447,000	15.4	22,611	19.1	0.0	10.5	17.3	0.0	19.2	19.3	50.0	17.0	44.4	50.0	34.5	0.0	0.0	18.8
Total	13	1,762,751	100.0	42,225	18.7	30.8	9.4	17.8	23.1	18.9	20.2	7.7	18.6	43.3	23.1	32.2	0.0	15.4	20.9

Source: 2020 U.S. Census ; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2021
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	2	47	6.3	4,551	9.5	0.0	9.5	11.9	50.0	9.5	43.0	50.0	46.4	28.8	0.0	30.6	6.8	0.0	4.0
Missouri Non-MSA	7	1,203	21.9	3,159	0.0	0.0	0.0	9.6	57.1	9.6	73.4	28.6	72.6	16.9	14.3	17.8	0.0	0.0	0.0
Springfield MSA	9	169	28.1	9,952	2.7	22.2	2.1	24.4	55.6	22.6	52.4	22.2	54.0	20.1	0.0	21.1	0.4	0.0	0.2
St Joseph MSA	2	78	6.3	1,217	7.7	50.0	9.0	18.3	50.0	18.2	41.5	0.0	40.5	32.5	0.0	32.3	0.0	0.0	0.0
St Louis MSA	12	126	37.5	30,598	3.2	16.7	2.5	17.5	33.3	16.3	25.2	33.3	25.1	53.0	16.7	55.1	1.1	0.0	1.0
Total	32	1,623	100.0	49,477	3.6	15.6	3.1	17.9	46.9	16.6	35.6	28.1	36.3	41.7	9.4	43.1	1.3	0.0	1.0

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%
Dollar amounts for loans are multiplied by 1000.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022-23**

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	0	0	0.0	3,680	11.8	0.0	8.1	26.0	0.0	24.8	31.6	0.0	34.8	27.8	0.0	29.5	2.7	0.0	2.8
Missouri Non-MSA	10	4,122	71.4	2,980	0.0	0.0	0.0	15.6	80.0	15.6	63.8	20.0	60.6	20.6	0.0	23.8	0.0	0.0	0.0
Springfield MSA	0	0	0.0	9,156	1.8	0.0	1.4	17.2	0.0	20.5	45.4	0.0	44.0	32.5	0.0	32.4	3.1	0.0	1.7
St Joseph MSA	2	76	14.3	1,242	6.2	0.0	7.6	11.0	50.0	11.3	72.8	50.0	71.2	10.0	0.0	9.9	0.0	0.0	0.0
St Louis MSA	2	110	14.3	29,191	4.7	0.0	3.6	14.9	0.0	12.9	23.9	50.0	27.5	55.8	50.0	54.7	0.7	0.0	1.2
Total	14	4,333	100.0	46,249	4.5	0.0	3.4	16.2	64.3	15.5	32.1	28.6	34.7	45.9	7.1	45.1	1.3	0.0	1.3

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 Dollar amounts for loans are multiplied by 1000.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2021
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	2	47	6.3	4,551	84.0	0.0	47.1	4.2	0.0	11.7	100.0	
Missouri Non-MSA	7	1,203	21.9	3,159	83.8	57.1	51.9	3.8	14.3	12.4	28.6	
Springfield MSA	9	169	28.1	9,952	85.1	66.7	45.9	4.9	0.0	10.0	33.3	
St Joseph MSA	2	78	6.3	1,217	77.8	50.0	54.0	6.3	0.0	15.9	50.0	
St Louis MSA	12	126	37.5	30,598	84.8	100.0	49.8	5.9	0.0	9.3	0.0	
Total	32	1,623	100.0	49,477	84.5	71.9	49.0	5.4	3.1	10.1	25.0	

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%
Dollar amounts for loans are multiplied by 1000.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2022-23
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 MO MSA	--	--	--	3,680	91.8	--	50.8	1.9	--	6.3	--	
Missouri Non-MSA	10	4,122	71.4	2,980	91.3	40.0	58.0	1.8	40.0	6.9	20.0	
Springfield MSA	--	--	--	9,156	92.8	--	52.8	2.1	--	5.1	--	
St Joseph MSA	2	101	14.3	1,242	86.8	100.0	53.8	3.5	0.0	9.7	0.0	
St Louis MSA	2	110	14.3	29,191	92.9	0.0	52.4	2.4	100.0	4.7	0.0	
Total	14	4,333	100.0	46,249	92.5	42.9	52.8	2.3	42.9	5.1	14.3	

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%
Dollar amounts for loans are multiplied by 1000.

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2021	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Columbia MSA	193	170	9.7	4.7	7.8	11.8	15.0	50.1	58.0	29.3	17.6	4.2	1.6	
Missouri Non-MSA	143	111	7.2	0.0	0.0	9.4	16.1	68.4	83.9	22.2	0.0	0.0	0.0	
Springfield MSA	928	791	46.4	5.2	8.8	20.7	30.3	54.1	52.9	19.6	8.0	0.4	0.0	
St Joseph MSA	589	503	29.5	2.5	1.7	25.6	37.9	48.7	45.8	23.2	14.6	0.0	0.0	
St Louis MSA	147	112	7.4	5.2	3.4	22.6	21.8	30.6	37.4	41.5	37.4	0.0	0.0	
Total	2,000	1,687	100.0	4.7	5.6	20.4	29.4	41.0	52.4	33.5	12.5	0.5	0.2	

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data.
 Due to rounding, totals may not equal 100.0%
 Dollar amounts for loans are multiplied by 1000.

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2022-23	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Columbia MSA	305	341	8.9	7.0	3.9	27.1	45.2	37.1	34.4	26.1	15.4	2.7	1.0	
Missouri Non-MSA	419	566	12.2	0.0	0.0	12.6	17.2	60.9	42.2	26.5	40.6	0.0	0.0	
Springfield MSA	1,585	2,112	46.1	4.7	7.1	19.8	30.7	45.1	45.7	29.6	15.9	0.8	0.5	
St Joseph MSA	925	1,215	26.9	6.3	13.1	19.0	26.7	65.2	55.4	9.5	4.9	0.0	0.0	
St Louis MSA	205	247	6.0	6.1	4.9	20.8	29.8	29.8	38.5	43.2	26.8	0.1	0.0	
Total	3,439	4,481	100.0	5.5	7.4	20.5	29.2	37.7	46.5	35.8	16.5	0.5	0.3	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data.
 Due to rounding, totals may not equal 100.0%
 Dollar amounts for loans are multiplied by 1000.

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower														2021
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Columbia MSA	193	170	9.7	26.7	59.1	14.8	29.5	16.0	8.8	42.5	2.6	0.0	0.0	
Missouri Non-MSA	143	111	7.2	21.3	27.3	15.4	51.0	18.1	13.3	45.3	8.4	0.0	0.0	
Springfield MSA	928	791	46.4	22.0	41.8	17.5	36.1	18.0	15.0	42.6	7.1	0.0	0.0	
St Joseph MSA	589	503	29.5	25.9	41.8	16.0	40.4	17.4	14.6	40.6	3.2	0.0	0.0	
St Louis MSA	147	112	7.4	21.4	43.5	15.7	30.6	17.0	22.4	45.8	3.4	0.0	0.0	
Total	2,000	1,687	100.0	22.2	42.6	16.0	37.4	17.2	14.7	44.6	5.4	0.0	0.0	

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%
Dollar amounts for loans are multiplied by 1000.

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower														2022-23
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Columbia MSA	305	341	8.9	24.3	65.6	16.0	28.5	17.2	5.6	42.4	0.3	0.0	0.0	
Missouri Non-MSA	419	566	12.2	18.8	32.2	15.8	36.5	18.8	20.0	46.7	11.2	0.0	0.0	
Springfield MSA	1,585	2,112	46.1	23.8	45.0	16.6	30.2	18.2	15.5	41.4	9.2	0.0	0.0	
St Joseph MSA	925	1,215	26.9	26.1	44.4	15.9	35.4	18.3	14.2	39.7	5.9	0.0	0.1	
St Louis MSA	205	247	6.0	21.7	43.4	16.4	39.0	17.6	10.7	44.3	6.3	0.0	0.5	
Total	3,439	4,481	100.0	22.4	45.0	16.3	32.7	17.8	14.5	43.5	7.6	0.0	0.1	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data.
Due to rounding, totals may not equal 100.0%
Dollar amounts for loans are multiplied by 1000.