

PUBLIC DISCLOSURE

January 20, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Guaranty Bank
RSSD# 3804535

2006 South Glenstone Avenue
Springfield, Missouri 65804

Federal Reserve Bank of Chicago

230 South LaSalle Street
Chicago, Illinois 60604-1413

NOTE: This document is an evaluation of this bank's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the bank. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this bank. The rating assigned to this bank does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial bank.

TABLE OF CONTENTS

PERFORMANCE EVALUATION	2
INSTITUTION'S CRA RATING.....	2
GUARANTY BANK'S OVERALL CRA RATING: SATISFACTORY.....	2
PERFORMANCE TEST RATING TABLE	2
SUMMARY OF MAJOR FACTORS THAT SUPPORT THE RATING.....	2
GUARANTY BANK.....	4
DESCRIPTION OF INSTITUTION	4
SCOPE OF THE EXAMINATION.....	5
CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA	7
LENDING TEST	7
INVESTMENT TEST.....	11
SERVICE TEST.....	12
FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW	14
SPRINGFIELD, MO MSA #44180 - FULL REVIEW	15
DESCRIPTION OF INSTITUTION'S OPERATIONS IN SPRINGFIELD, MO MSA #44180	15
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SPRINGFIELD, MO MSA #44180	21
JOPLIN, MO-KS MSA #27900 - FULL REVIEW	34
DESCRIPTION OF INSTITUTION'S OPERATIONS IN JOPLIN, MO-KS, MSA #27900	34
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN JOPLIN, MO-KS MSA #27900.....	40
APPENDIX A – 2023 HMDA-REPORTABLE LENDING TABLES JOPLIN, MO-KS MSA #27900.....	51
APPENDIX B – MAPS OF ASSESSMENT AREAS	55
APPENDIX B – SCOPE OF EXAMINATION	56
APPENDIX C – GLOSSARY	57

INSTITUTION’S CRA RATING

Guaranty Bank’s Overall CRA Rating: Satisfactory

Performance Test Rating Table

The following table indicates the performance level of Guaranty Bank with respect to the lending, investment, and service test.

Guaranty Bank			
Performance Levels	Performance Tests		
	Lending Test	Investment Test	Service Test
Outstanding			
High Satisfactory	✓	✓	✓
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

Summary of Major Factors that Support the Rating

Lending Test:

- Lending levels reflect good responsiveness to assessment area credit needs;
- A high percentage of loans are made in the bank’s combined assessment area;
- The geographic distribution of loans reflects good penetration throughout the combined assessment area;
- The distribution of borrowers reflects, given the product lines offered, adequate penetration among customers of different income levels and businesses of different sizes;

- The bank exhibits an adequate record of serving the credit needs of low-income individuals and areas of very small businesses;
- The bank makes a relatively high level of community development loans; and
- The bank makes use of innovative and flexible lending practices in serving assessment area credit needs.

Investment Test:

- The bank made a significant level of qualified community development investments and grants, particularly those not routinely provided by private investors, occasionally in a leadership position;
- The bank makes significant use of innovative and complex investments to support community development initiatives; and
- The bank exhibits excellent responsiveness to credit and community needs.

Service Test:

- Delivery systems are readily accessible to the bank's geographies and individuals of different income levels in its combined assessment area;
- The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and individuals;
- Services do not vary in a way that inconveniences its assessment area, particularly low- and moderate-income geographies and individuals; and
- The bank provides a relatively high level of community development services.

GUARANTY BANK

DESCRIPTION OF INSTITUTION

Guaranty Bank is a \$2.4 billion commercial bank, as of September 30, 2025, which operates in the state of Missouri's Christian, Greene, Jasper, and Newton counties. The bank is a wholly owned subsidiary of QCR Holdings, Inc. (QCRH), a four-bank holding company based in Moline, Illinois, which provides the bank with compliance oversight, resources, and dedicated compliance staff overseeing the bank's activities.

Guaranty Bank is a large intrastate bank operating in two assessment areas within the Springfield, MO Metropolitan Statistical Area (MSA) #44180 and the Joplin, MO-KS Metropolitan Statistical Area (MSA) #27900. The bank's operations include the main office, 14 branch locations, and 14 full-service automated teller machines (ATMs). Since the previous evaluation, the bank closed its only Loan Production Office (LPO) which was located outside of the bank's combined assessment area in a middle-income census tract within Webster County, Missouri. Products and services do not vary by branch location.

The bank offers a full range of loan products with commercial lending representing the majority of the loan portfolio at 84.9 percent, by dollar volume. The portfolio is also comprised of residential real estate loans (7.7 percent), consumer loans (3.5 percent), agricultural loans (2.6 percent), and other loans (1.3 percent). Deposit products include, but are not limited to, personal checking and savings, business checking and savings, money market, certificates of deposit, investment, individual retirement, and health savings accounts. The bank's website, <https://gbankmo.com>, provides customers with online bill-pay, account transfers, e-statements, and mobile banking capabilities. Further, individuals may submit home purchase and refinance applications, as well as auto, boat, and personal loans online through the website.

Guaranty Bank's mobile application also allows customers to check balances, view account activity, transfer funds between accounts, and locate ATM or branch locations. Further, the bank received its Bank On National Certification for the low-cost digital checking account offered by the bank. The Bank On Certified digital checking account meets several affordable features helping ensure potential borrowers have access to safe and affordable financial products and services.

As of June 30, 2025, according to the Federal Deposit Insurance Corporation (FDIC) Summary of Deposits Market Share Report, Guaranty Bank ranked second out of 43 financial institutions operating within the combined assessment area. The bank held \$1.9 billion in total deposits representing a market share of 9.5 percent. The financial institution with the largest percentage of the deposit market share is Great Southern Bank at 12.2 percent, and OMB Bank ranked third with a deposit market share of 7.3 percent. As one of the leaders in deposit market share among FDIC-insured financial institutions, Guaranty Bank's ability to meet various credit needs is not materially inhibited due to competition within the assessment area.

Marketing efforts are generally for brand awareness and targeted throughout the bank’s assessment area. Content is typically focused on commercial, consumer, and residential real estate products and services, as well as highlighting their services, donations, and outreach events within the community through a variety of mediums including social media platforms such as Facebook, X, Instagram, LinkedIn, and YouTube.

Details of the composition of the bank’s loan portfolio are provided in the following table.

Composition of Loan Portfolio as of September 30, 2025 (000's)		
Type	\$	%
Commercial	1,609,128	84.9
Residential Real Estate	146,366	7.7
Consumer	65,580	3.5
Agricultural	49,529	2.6
Other	25,575	1.3
Total	1,896,178	100.0

Note: Percentages may not total 100.0 percent due to rounding.

There are no known legal, financial or other factors impeding the bank’s ability to help meet the credit needs in its communities.

At its previous evaluation conducted on May 1, 2023, the bank was rated **Satisfactory** under the CRA.

SCOPE OF THE EXAMINATION

Guaranty Bank’s CRA performance was evaluated using the Federal Financial Institutions Examination Council’s Large Institution CRA Examination Procedures. Performance was evaluated in the context of information about the institution and its assessment areas, including the bank’s asset size, financial condition, competition, and the economic and demographic characteristics of the combined assessment area.

Full-scope examination procedures were conducted for the bank’s two assessment areas, Springfield, MO MSA #44180 (Springfield, MO MSA) and Joplin, MO-KS MSA #27900 (Joplin, MO-KS MSA) given the distribution of the bank’s branch locations, prevalence of low- and moderate-income census tracts, and the volume of deposit and lending activities within both assessment areas. While both assessment areas are evaluated using full-scope examination procedures, the Springfield, MO MSA assessment area was given greater weight as it holds a higher concentration of branch offices, including the main office, and retains a greater percentage of the bank’s lending and deposit activities.

This evaluation places greater emphasis on CRA-reportable small business lending, as commercial lending comprises a larger proportion of the bank's loan portfolio and the bank considers itself to be primarily a commercial lender, focusing much of its attention and growth strategies in this market.

The bank's performance was evaluated using the following performance standards:

- ***Lending Activity*** – HMDA-reportable loans were reviewed to determine the bank's responsiveness to credit needs in the bank's assessment area from January 1, 2023, to December 31, 2024. CRA-reportable small business loans were reviewed to determine the bank's responsiveness to small business credit needs in the bank's assessment areas from January 1, 2024, to December 31, 2024.
- ***Lending in the Assessment Area*** - HMDA-reportable loans were reviewed to determine the percentage of loans originated in the assessment area from January 1, 2023, to December 31, 2024. CRA-reportable small business loans were reviewed to determine the percentage of loans originated in the combined assessment area from January 1, 2024, to December 31, 2024.
- ***Geographic Distribution of Lending in the Assessment Area*** – HMDA- reportable loans and CRA-reportable small business loans were analyzed to determine the extent to which the bank is making loans in census tracts of different income levels, including those designated as low- or moderate-income. HMDA-reportable loans were analyzed from January 1, 2023, to December 31, 2024, while CRA-reportable small business loans were analyzed from January 1, 2024, to December 31, 2024.
- ***Lending to Borrowers of Different Incomes and Businesses of Different Sizes*** – HMDA-reportable loans were analyzed to determine the loan distribution among borrowers of different income from January 1, 2023, to December 31, 2024. CRA-reportable small business loans were analyzed to determine the loan distribution among businesses of different revenue sizes from January 1, 2024, to December 31, 2024.
- ***Community Development Lending*** - The number, volume, innovativeness, and complexity of community development loans were reviewed from May 2, 2023, through January 20, 2026.
- ***Innovative or Flexible Lending Practices*** – The degree to which the bank uses innovative and flexible lending practices to address the credit needs of low- and moderate-income individuals, small businesses, and geographies.

- *Investments* – Qualified investments from May 2, 2023, through January 20, 2026, were reviewed to determine the bank’s responsiveness to community development needs. Qualified investments were also evaluated to determine the bank’s use of innovative or complex investments.
- *Services* - The distribution of the bank’s branch offices, banking services, hours of operation, availability of loan and deposit products, and the extent and innovativeness of community development services were reviewed from May 2, 2023, through January 20, 2026.

In addition, three community representatives were contacted in connection with this evaluation to provide information regarding local economic and socio-economic conditions in the assessment areas. Organizations contacted were able to provide context on affordable housing, community and economic development, and credit needs of their community.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

LENDING TEST

Guaranty Bank’s performance relative to the lending test is rated **high satisfactory** based on its performance across the combined assessment area. Factors contributing to the rating include: lending levels reflect good responsiveness to assessment area credit needs; a high percentage of loans are made in the bank’s assessment area, including low- and moderate-income geographies; the bank demonstrates adequate distribution of loans among individuals of different income levels and businesses of different sizes; the bank makes use of innovative and/or flexible lending practices to address the credit needs of low- or moderate-income individuals or geographies; and the bank makes a relatively high level of community development loans.

Level of Lending Activity

Guaranty Bank’s lending levels reflect good responsiveness to credit needs in its assessment area, taking into account the number and amount of home mortgage and small business loans in its assessment area. During the review period, the bank’s HMDA-reportable and CRA-reportable small business lending activity comprised 950 loans for a total of approximately \$298.6 million. This level of lending represents a decrease from the previous evaluation both in number and dollar volume during which time the bank originated 2,232 HMDA-reportable and small business loans for a total of \$729.8 million. Loan volume trends in general for the aggregate show broad declines across the combined assessment area and the full MSAs in which the bank operates.

With respect to HMDA-reportable lending, the bank’s performance declined 51.3 percent by number and 57.7 percent by dollar amount when compared to the previous evaluation. All HMDA-reportable subproducts experienced a decline when compared to the previous evaluation;

however, refinance lending experienced the sharpest decline in number and dollar amount, each at 74.7 percent. It should be noted the previous evaluation considered the bank’s lending during 2021 and 2022, which included a portion of the COVID-19 pandemic. During this time home mortgage rates fell to historic lows, incentivizing homeowners to seek more affordable mortgage payments by refinancing their existing home mortgage loans as well as fueling demand for home purchases. In contrast, during this examination period interest rates have risen, cooling demand for both existing mortgage refinancing and home purchases.

Regarding CRA-reportable small business lending, the bank’s performance declined 65.2 percent by number and 62.4 percent by dollar when compared to the previous evaluation during which time the bank originated 980 small business loans for \$212.0 million. The decline in CRA-reportable lending can be partially attributable to the bank’s participation in the U.S. Small Business Administration’s (SBA) Paycheck Protection Program (PPP) in response to the COVID-19 pandemic which ended in 2021. Additionally, the higher interest rate environment has constrained traditional small business lending opportunities, and increased competition among lenders for a limited number of prospective borrowers.

While Guaranty Bank’s lending activity has decreased since the previous evaluation, the institution continues to demonstrate active lending within its assessment areas ranking (in 2024) 16th out of 318 HMDA-reporting lenders and 11th out of 101 CRA-reporting lenders in the Springfield, MO MSA, and 36th out of 318 HMDA-reporting lenders and 11th out of 75 CRA-reporting lenders in the Joplin, MO-KS MSA. Overall, the bank’s performance demonstrates good responsiveness to combined assessment area credit needs when considering the overall lending environment, and in comparison to other lenders within the market during the same timeframe.

The following table summarizes the bank’s lending activity from January 1, 2023, through December 31, 2024.

Summary of Lending Activity				
January 1, 2023 – December 31, 2024				
Loan Type	#	%	\$(000s)	%
Home Purchase	456	47.9	117,369	39.3
Refinancing	118	12.4	21,934	7.3
Home Improvement	5	0.5	543	0.2
Multi-Family Housing	31	3.3	79,223	26.5
Total HMDA Reportable	610	64.2	219,069	73.4
Total Small Business Reportable	340	35.8	79,535	26.7
Total Loans	950	100.0	298,604	100.0
<i>Note: Percentages may not total to 100.0 percent due to rounding.</i>				

Assessment Area Concentration

Guaranty Bank made a high percentage of loans in its combined assessment area. Of the 950 loans originated during the evaluation period, the bank originated 72.8 percent of total loans by count and 66.2 percent by dollar amount inside the combined assessment area. When evaluating loans by total count, the bank originated 69.3 percent of HMDA-reportable loans and 79.1 percent of small business loans inside the combined assessment area. When evaluating loans by dollar amount, the bank originated 61.1 percent of HMDA-reportable loans and 80.2 percent of small business loans inside the combined assessment area. When compared to the previous examination, during which time the bank originated 2,232 total loans, the proportion of loans originated within the assessment area remained relatively comparable at 74.1 percent. The bank did see an improvement of 9.1 percent by dollar volume as 57.1 percent of HMDA-reportable and small business loans were originated within the combined assessment area during the previous evaluation.

The following table summarizes the bank’s lending inside and outside its combined assessment area for HMDA-reportable and CRA-reportable small business loans from January 1, 2023, through December 31, 2024.

Lending Inside and Outside the Assessment Area								
Loan Type	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	4	80.0	408	75.1	1	20	135	24.9
Home Purchase – Conventional	259	73.6	70,168	74.9	93	26.4	23,576	25.1
Home Purchase – FHA	40	47.1	9,264	54.8	45	52.9	7,656	45.2
Home Purchase – VA	13	68.4	4,596	68.5	6	31.6	2,109	31.5
Multi-Family Housing	14	45.2	34,025	42.9	17	54.8	45,198	57.1
Refinancing	93	78.8	15,392	70.2	25	21.2	6,542	29.8
Total HMDA Reportable	423	69.3	133,853	61.1	187	30.7	85,216	38.9
Total Small Business Reportable	269	79.1	63,824	80.2	71	20.9	15,711	19.8
Total Loans	692	72.8	197,677	66.2	258	27.1	100,927	33.8

Geographic and Borrower Distribution

Guaranty Bank’s lending activities reflect good distribution throughout the assessment area, while lending activities reflect adequate distribution, particularly in its assessment area, of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the bank. Further discussion with respect to the geographic and borrower distribution of lending can be found in the individual assessment area analyses.

Guaranty Bank exhibits an adequate record of serving the credit needs of highly economically disadvantaged areas in its assessment area, low-income individuals, or businesses with gross annual revenues of \$1 million or less, consistent with safe and sound operations. Additionally, the

bank makes use of innovative or flexible lending practices in a safe and sound manner to address the credit needs of low- or moderate-income individuals or geographies.

The bank works with the Missouri Bond Downpayment Assistance Program to assist low- and moderate-income (LMI) individuals and families in purchasing a home. Specifically, programs such as First Place Program and Next Step Program have income limits that ensure qualifying loans are assisting LMI individuals and families on their paths to homeownership. Guaranty Bank also works with first time homebuyers with their Community Mortgage Program allowing for low downpayments, reduced fees and costs, and underwriting standards designed to encourage affordable homeownership while maintaining lending standards. With respect to commercial lending, Guaranty Bank encourages small business borrowing through SBA 7(a) and SBA Express Loan programs. These have several key benefits that allow for more flexibility by the borrower and increase access to capital for purchasing, refinancing, or operating a small business.

Community Development Lending

Guaranty Bank makes a relatively high level community development loans. During the review period, the bank originated 56 qualified community development loans totaling \$257.9 million, of which 45 loans totaling \$190.4 million were originated within the full review assessment areas. The majority of community development loans were towards revitalization/stabilization efforts, representing 76.8 percent by number and 87.1 percent by dollar amount.

The bank's community development lending has declined since the previous evaluation during which the bank originated 173 loans totaling \$541.8 million. When adjusting for variance in review period length, the current performance decreased 60.8 percent by number and 42.3 percent by dollar amount. The previous evaluation's review period included expanded community development opportunities nationwide due to the COVID-19 pandemic which were not present during the current review period. The expanded opportunities for community development during the previous evaluation resulted in an elevated number of qualified community development loans originated outside of the bank's assessment area. During the current evaluation 11 loans for \$67.5 million were made in the broader statewide and regional area, whereas during the previous evaluation, considering the number of opportunities available due to the COVID-19 pandemic nationally, the bank originated 81 loans for \$297.1 million in the broader statewide and regional area. Please refer to the individual assessment areas for more information.

The following table presents the bank's community development loans throughout its combined assessment area during the review period.

Community Development Loans May 2, 2023, through January 20, 2026										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize/Stabilize		Total #	Total \$(000s)
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)		
Full Review Assessment Areas										
Springfield, MO MSA	3	834	4	775	0	0	34	172,008	41	173,617
Joplin, MO-KS MSA	0	0	0	0	1	69	3	16,712	4	16,781
Full Review Total	3	834	4	775	1	69	37	188,720	45	190,398
Other										
Statewide or Regional Area	5	31,479	0	0	0	0	6	35,988	11	67,467
Grand Total	8	32,313	4	775	1	69	43	224,708	56	257,865

INVESTMENT TEST

Guaranty Bank’s performance relative to the Investment Test is **High Satisfactory** based on a significant level of qualified community development investments and grants, particularly those not routinely provided by private investors, occasionally in a leadership position. Further, Guaranty Bank makes significant use of innovative and/or complex investments to support community initiatives and demonstrates excellent responsiveness to credit and community development needs.

During the evaluation period, the bank made or maintained 17 community development investments totaling approximately \$15.2 million, of which 11 investments for \$10.7 million were within the full review assessment areas. Additionally, of the qualified community development investments, three investments, totaling \$3.1 million, were made within the current review period whereas the remaining investments were made prior to the current evaluation period and still maintained by the bank. Community development investments are comprised of several complex and/or responsive investments. The bank made a bond investment to provide the capital needed for improvements to a local school with greater than 50.0 percent of its students eligible for the United States Department of Agriculture’s National School Lunch Program providing free or reduced-priced lunches to students, predominantly those who are low- or moderate-income. Further, the bank invested in multiple funds and commissions focused on revitalizing or stabilizing downtown areas throughout Springfield, as well as serving in a leadership role in several affordable housing projects impacting low- or moderate-income census tracts. During the previous evaluation the bank made, and maintained, 11 community development investments totaling approximately \$6.6 million. When compared to the previous examination’s performance, and accounting for the variance in review period length, the bank increased their investment activity by 87.3 percent by number and 180.5 percent by dollar amount. Given the shorter review period, this improvement is a sign of the bank’s commitment to addressing credit needs throughout its assessment area.

The following table presents the bank’s community development investments throughout its combined assessment area during the review period.

Community Development Investments May 2, 2023, through January 20, 2026										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize/ Stabilize		Total #	Total \$(000s)
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)		
Full Review Assessment Areas										
Springfield, MO MSA	5	8,445	0	0	2	13	3	1,636	10	10,093
Joplin, MO-KS MSA	0	0	1	600	0	0	0	0	1	600
Full Review Total	5	8,445	1	600	2	13	3	1,636	11	10,693
Other										
Statewide or Regional Area	2	1,194	0	0	0	0	4	3,296	6	4,490
Grand Total	7	9,639	1	600	2	13	7	4,932	17	15,183

Additionally, the bank made 187 donations totaling \$341,408.65 to organizations during the evaluation period. Donations were made to a variety of organizations with the majority of donations, by dollar volume, going towards community service efforts targeting low- or moderate-income individuals and communities with 68.4 percent of donations being made to these organizations. During the previous evaluation the bank made 175 community development donations totaling \$288,494. Guaranty Bank enhanced their donation activity within the combined assessment area that, when adjusted for variance in review period lengths, resulted in an increase of 29.5 percent by number and 43.4 percent by dollar volume.

Please refer to the individual assessment areas for more information.

SERVICE TEST

Guaranty Bank’s performance relative to the Service Test is **High Satisfactory** based on the following major factors in the assessment areas: delivery services are readily accessible to geographies and individuals of different income levels in its assessment area; the bank’s record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income individuals; services (including, where appropriate, business hours) do not vary in a way that inconveniences its assessment areas, particularly low- or moderate-income geographies or low- or moderate-income individuals; and the bank provides a relatively high level of community development services.

Retail Services

Guaranty Bank's retail delivery services are readily accessible to geographies and individuals of different income levels in its assessment area. The bank operates a total of 15 branch office locations (including the main office), six of which are located in low- or moderate-income census tracts. In addition, the bank operates a total of 14 ATMs, six of which are located in low- or moderate-income census tracts. Although branch offices are not evenly distributed throughout the combined assessment area, they remain accessible to low- and moderate-income individuals and geographies. Alternative delivery systems exist and include phone, internet banking, and mobile banking.

To the extent changes have been made, the bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income individuals. Since the previous evaluation, the bank closed one LPO which was located in a middle-income census tract in the Springfield, MO MSA, but outside of the bank's delineated assessment area. The closure of the LPO location did not have a material impact on the bank's ability to serve LMI individuals or areas, particularly those within its combined assessment area.

Bank services do not vary in a way that inconveniences its combined assessment area, particularly low- or moderate-income geographies or low- or moderate-income individuals. Office hours are generally 9:00 a.m. to 5:00 p.m., Monday through Friday, with some locations, including locations within LMI census tracts, offering extended hours from 9:00 a.m. to 12:00 p.m. on Saturday, with drive-up access. Applications for loan and deposit products are accepted at each location. Additionally, mortgage and other loan product applications are accepted online through the bank's website.

Community Development Services

Guaranty Bank provides a relatively high level of community development services. During the review period, the bank provided 2,369 hours of community development services. As illustrated in the following table, community development services were accomplished in partnership with a variety of organizations; however, the large majority of hours were dedicated to organizations which conduct community services targeting low- or moderate-income individuals and geographies with 88.0 percent of service hours going towards these efforts. This includes financial literacy education and homeownership counseling, which community representatives identified as significant needs within the bank's assessment areas. This demonstrates the bank's understanding and responsiveness to the needs of the communities it serves. During the previous evaluation the bank conducted 3,255 community development service hours. The bank's current performance in community development service hours decreased 27.2 percent when compared to the previous evaluation; however, when adjusting for variance in review period length the number of qualified service hours only declined by 11.8 percent.

The following table presents the bank’s community development services throughout its combined assessment area during the review period.

Community Development Services May 2, 2023, through January 20, 2026					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize/Stabilize	Total Hours
	Hours	Hours	Hours	Hours	
Full Review Assessment Areas					
Springfield, MO MSA	107.5	1,870.5	22.5	0	2,000.5
Joplin, MO-KS MSA	17	214.5	90	47	368.5
Full Review Total	124.5	2,085	112.5	47	2,369
Other					
Statewide or Regional Area	0	0	0	0	0
Grand Total	124.5	2,085	112.5	47	2,369

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

SPRINGFIELD, MO MSA #44180 - Full Review

SCOPE OF THE EXAMINATION

Full-scope examination procedures were used to evaluate the bank's performance in the Springfield, MO MSA assessment area. The review of this assessment area is consistent with the scope discussed in the "Scope of Examination" section of this performance evaluation.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN SPRINGFIELD, MO MSA #44180

Guaranty Bank's assessment area located in the Springfield, Missouri MSA (Springfield, MO MSA) remains unchanged since the previous evaluation and consists of the entirety of Christian and Greene counties. The bank does not include Dallas, Polk, and Webster counties within the assessment area delineation which comprises the remainder of the Springfield, MO MSA. Within this assessment area the bank operates a main office and nine branch locations, each including a full-service ATM with the exception of the main office. One branch and ATM are located in a low-income census tract, while four branches and ATMs are located in moderate-income census tracts, and three branches and ATMs are located in middle-income census tracts. Finally, one branch and an ATM, as well as the main office, are located in an upper-income census tract. Since the previous evaluation, the bank closed its sole LPO located within a middle-income census tract in Webster County. The assessment area includes the principal city of Springfield, Missouri, and as of 2024, consists of 97 total census tracts: five low-income, 21 moderate-income, 40 middle-income, 29 upper-income, and two unknown-income census tracts. There have been no changes to the distribution of tracts since the previous evaluation. Income information for the new tracts has not been made available since the tracts were divided.

According to the June 30, 2025, FDIC Deposit Market Share Report, Guaranty Bank ranked second among 36 FDIC-insured institutions operating within the assessment area. The bank held \$1.7 billion in deposits representing 11.0 percent of the total deposit market share. In comparison, Great Southern Bank, the market leader, held \$2.3 billion in deposits representing 15.0 percent of the market share. The Central Trust Bank, the third ranking institution, held \$1.4 billion in deposits representing 9.2 percent of the deposit market.

In 2024, Guaranty Bank ranked 16th out of 318 HMDA-reporters, tied with Mortgage Research Center, LLC, originating 216 HMDA-reportable loans. U.S. Bank National Association ranked first with 602 HMDA-reportable originations or purchases within the assessment area. Oakstar Bank, the 15th ranked institution, and Amerihome Mortgage Company, LLC, the 17th ranked institution, originated or purchased 260 and 208 HMDA-reportable loans, respectively. Additionally, in 2024, the bank ranked 11th among 101 CRA-reporters, originating 221 CRA-reportable loans in the assessment area. By comparison, the first ranked institution, American Express National Bank, originated 1,716 CRA-reportable loans in the assessment area. Oakstar Bank, the 10th ranked institution, originated 250 CRA-reportable loans in the assessment area, while Lake Forest Bank &

Trust Company, ranked 12th, originated 188 CRA-reportable loans in the assessment area.

Additional assessment area demographic information is provided in the following table.
Demographic data for 2023 can be found in Appendix A.

2024 Springfield, MO MSA 44180 AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	5	5.2	2,672	2.7	690	25.8	17,975	18.4
Moderate	21	21.6	16,291	16.7	3,052	18.7	17,895	18.3
Middle	40	41.2	44,302	45.3	3,433	7.7	21,174	21.7
Upper	29	29.9	34,381	35.2	1,135	3.3	40,738	41.7
Unknown	2	2.1	136	0.1	35	25.7	0	0.0
Total AA	97	100.0	97,782	100.0	8,345	8.5	97,782	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	8,251	1,544	1.6	18.7	5,955	72.2	752	9.1
Moderate	34,187	12,799	13.3	37.4	18,880	55.2	2,508	7.3
Middle	76,099	44,063	45.9	57.9	28,098	36.9	3,938	5.2
Upper	49,279	37,585	39.1	76.3	9,795	19.9	1,899	3.9
Unknown	1,425	27	0.0	1.9	1,273	89.3	125	8.8
Total AA	169,241	96,018	100.0	56.7	64,001	37.8	9,222	5.4
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	329	2.0	307	2.1	21	1.7	1	0.8
Moderate	3,643	22.6	3,125	21.2	504	40.6	14	11.9
Middle	7,518	46.7	6,987	47.4	467	37.6	64	54.2
Upper	4,275	26.6	4,017	27.3	220	17.7	38	32.2
Unknown	322	2.0	291	2.0	30	2.4	1	0.8
Total AA	16,087	100.0	14,727	100.0	1,242	100.0	118	100.0
Percentage of Total Businesses:			91.5		7.7		0.7	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	1	0.4	1	0.4	0	0.0	0	0.0
Moderate	18	6.9	17	6.6	1	50.0	0	0.0
Middle	136	52.5	135	52.5	1	50.0	0	0.0
Upper	101	39.0	101	39.3	0	0.0	0	0.0
Unknown	3	1.2	3	1.2	0	0.0	0	0.0
Total AA	259	100.0	257	100.0	2	100.0	0	0.0
Percentage of Total Farms:			99.2		0.8		0.0	
<i>Source: 2024 FFIEC Census Data 2024 Data & Business Data 2016-2020 U.S. Census Bureau: American Community Survey</i>								
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

Population Characteristics

The following table presents the population trends for the assessment area, the two counties which comprise the assessment area, the Springfield, MO MSA, and the state of Missouri from 2015 to 2020. According to the 2020 U.S. Census Bureau demographic data, the assessment area’s population is 387,757. The assessment area experienced an increase in population of 6.5 percent between 2015 and 2020, which is higher than the Springfield, MO MSA and the state of Missouri’s population growth rates of 6.0 percent and 1.8 percent, respectively, during the same period. Of the counties comprising the assessment area, Greene County experienced a population growth of 5.5 percent, while Christian County, which is the smaller of the two counties within the assessment area by population size, experienced a higher rate of population growth of 9.8 percent, during the same time period. A community representative noted the newly established Amazon Fulfillment Center and a Buc-ee’s location have attracted new residents for employment opportunities. Additionally, strong public-school systems attract families to both counties within the assessment area. Christian County’s larger growth (9.8 percent) was attributed in part to the attraction of these employment opportunities, but also to lower cost of living, larger residential properties by acreage, and commutability to jobs in the city of Springfield.

Population Change			
Area	2015 Population	2020 Population	Percent Change (%)
Assessment Area	364,110	387,757	6.5
Christian County, MO	80,904	88,842	9.8
Greene County, MO	283,206	298,915	5.5
Springfield, MO MSA	448,471	475,432	6.0
State of Missouri	6,045,448	6,154,913	1.8

*Source: 2011-2015 U.S. Census Bureau American Community Survey
2020 U.S. Census Bureau Decennial Census*

Income Characteristics

According to the U.S. Census Bureau, the assessment area is comprised of 97,782 families, of which 18.4 percent are designated as low-income, 18.3 percent are moderate-income, 21.7 percent are middle-income, and 41.7 percent are upper-income. However, 8.5 percent of families residing within the assessment area live below the poverty line. According to the 2016-2020 American Community Survey (ACS), the median family income (MFI) for the assessment area is \$65,921, which is above the Springfield, MO MSA as a whole at \$64,545, but below the MFI for the state of Missouri at \$72,834. Christian County has an MFI of \$73,921, experiencing a growth of 12.0 percent from 2015 to 2020. Both the MFI and percent change of MFI is slightly greater than the state of Missouri’s MFI and growth rate during the same time period (9.6 percent). However, Greene County’s MFI, at \$63,795, experienced a 7.0 percent growth rate over the same period, which is below Christian County and the state of Missouri. A community representative stated that while

entry-level opportunities exist within the major industries of the assessment area, including healthcare and manufacturing, Greene County has particularly struggled to increase wages at the same rate as other areas or to keep up with inflation. Christian County, alternatively, has a larger population with higher wages who commute into the city of Springfield for work.

Median Family Income Change			
Area	2015 Median Family Income (\$)	2020 Median Family Income (\$)	Percent Change (%)
Assessment Area	61,036	65,921	8.0
Christian County, MO	66,030	73,921	12.0
Greene County, MO	59,628	63,795	7.0
Springfield, MO MSA	60,035	64,545	7.5
State of Missouri	66,438	72,834	9.6

*Source: 2011 - 2015 U.S. Census Bureau American Community Survey
2016 - 2020 U.S. Census Bureau American Community Survey
Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.*

Housing Characteristics

The bank’s assessment area includes 169,241 housing units. The majority of housing units are owner-occupied at 56.7 percent, whereas rental units account for 37.8 percent of total units. Within the assessment area 5.4 percent of housing units are vacant, which is lower than the percentage of vacant units in the Springfield, MO MSA and the state of Missouri at 6.5 and 13.0 percent, respectively.

The following table presents recent housing cost burden for individuals within the assessment area, counties which comprise the assessment area, the Springfield, MO MSA, and the state of Missouri. The housing cost burden is the ratio of a household’s gross monthly housing costs to the household’s gross monthly income. Housing cost burden, as defined by the Department of Housing and Urban Development (HUD), takes these quantitative ratios, and assigns qualitative values to them. If a household’s housing cost is above 30.0 percent of its income, then that household is considered housing cost burdened. A higher percentage of low-income households are impacted than moderate-income individuals as both renters and owners. A slightly higher percentage of renters meet the cost burden criteria within the assessment area at 42.0 percent when compared to the Springfield, MO MSA as a whole and the state of Missouri at 41.1 percent and 39.6 percent, respectively. As it pertains to homeowners which meet the cost burden criteria, the assessment area is in general alignment, at 14.9 percent, with the Springfield, MO MSA at 14.8 percent, but below the state of Missouri at 16.1 percent. Christian County had a lower percentage of renters and homeowners which met the cost burden criteria compared to Greene County, indicating Christian County is slightly more affordable.

As previously mentioned, the assessment area has been experiencing population growth due, in part, to the expanded employment opportunities and reputable public-school systems. As a result, a community representative stated there was strong demand for housing, including affordable housing, but some municipalities were being more proactive in working with developers to increase new housing construction. Cities like Republic, located outside of Springfield and at the border between the two counties, had been able to meet housing needs by streamlining development and zoning processes, and working with real estate developers.

Housing Cost Burden						
Area	Cost Burden – Renters (%)			Cost Burden – Owners (%)		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Assessment Area	79.5	40.4	42.0	59.5	27.7	14.9
Christian County, MO	79.2	37.1	33.7	57.8	37.1	14.1
Greene County, MO	79.6	41.0	43.2	59.9	25.3	15.1
Springfield, MO MSA	77.8	38.5	41.1	57.8	26.6	14.8
State of Missouri	74.0	30.3	39.6	58.6	26.5	16.1
<i>Cost Burden is housing cost which equals 30 percent or more of household income</i>						
<i>Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy</i>						

Employment Conditions

The following table shows unemployment statistics for the assessment area, counties which comprise the assessment area, the Springfield, MO MSA, and the state of Missouri. The assessment area’s unemployment rate of 3.3 percent in 2024 remains lower than the state of Missouri’s unemployment rate of 3.7 percent, and in alignment with the Springfield, MO MSA unemployment rate also at 3.3 percent. Community representatives stated the increase in population did not negatively impact unemployment, as many of the new residents moved to the local area due to employment opportunities. As mentioned previously, the community representative stated Amazon and Buc-ee’s opened locations which created new job opportunities, while also acknowledging there has not been an issue with existing companies consolidating or leaving the area.

Unemployment Rates (%)				
Area	2021	2022	2023	2024
Assessment Area	3.3	2.2	2.7	3.3
Christian County, MO	3.2	2.2	2.7	3.2
Greene County, MO	3.3	2.2	2.7	3.3
Springfield, MO MSA	3.3	2.3	2.8	3.3
State of Missouri	4.2	2.6	3.1	3.7
<i>Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics</i>				

Industry Characteristics

The assessment area contains a diverse employment base and is most heavily impacted by health care and social assistance, retail, government, and accommodation and food services industries based on data from the U.S. Bureau of Labor Statistics. A community representative indicated the new Fulfillment Center for Amazon and a new Buc-ee's location provided an increase in employment opportunities, but there have been no other major changes to the local economic profile.

Community Representatives

Information from two community representatives was considered during the evaluation to provide information regarding local economic and demographic conditions. The representatives provided information on housing, population changes, employment, and economic impacts within the assessment area. Both community representatives highlighted a shortage of, and a growing need for more, affordable housing options. One representative stated that while some cities and towns had faced challenges meeting the growing or changing needs of the community, some cities, like Republic, Missouri were working to streamline the process for new business development and zoning to facilitate growth. As a result, while challenges such as affordable housing have had broad impacts, some locations have had more success in addressing them. Additionally, one representative indicated that there was a highly competitive market due to the number of banks in the area, but thought there was space for more economic development partnership opportunities among the banks.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SPRINGFIELD, MO MSA #44180

LENDING TEST

The geographic distribution reflects good penetration throughout the assessment area. The distribution of borrowers reflects adequate penetration among individuals of different income levels and businesses of different sizes given the product lines offered. Guaranty Bank exhibits an adequate record of serving the credit needs of low-income individuals and areas and very small businesses. The bank is a leader in making community development loans, and makes extensive use of innovative and flexible lending practices in serving assessment area credit needs.

Geographic Distribution of Loans

Guaranty Bank's lending activities reflect good distribution throughout the assessment area. An analysis of the geographic distribution of loans was conducted to determine the dispersion of loans among the census tract designations within the assessment area, particularly in low- and moderate-income census tracts. There were no conspicuous lending gaps in the bank's lending

distribution across the assessment area, including low- and moderate-income census tracts. During the review period, the bank originated loans in 93 of the 97 census tracts within the assessment area, including 23 of the 26 low- or moderate-income census tracts.

When determining performance, the comparison to aggregate lender figures was weighted more heavily than the assessment area demographics as it is a better measure of loan demand.

A detailed discussion of HMDA-reportable and CRA-reportable small business lending is provided below. In addition, due to low volume, home improvement and multi-family loans were not considered in the analysis of HMDA-reportable lending.

HMDA-Reportable Loans

The geographic distribution of HMDA-reportable loans reflects adequate dispersion throughout the assessment area. In 2024, Guaranty Bank originated 1.4 percent of its total HMDA-reportable loans in low-income census tracts, which is comparable to the aggregate at 2.1 percent and the percentage of owner-occupied units located in low-income census tracts at 1.6 percent. The bank originated 14.0 percent of its HMDA-reportable loans in moderate-income census tracts, which is below the aggregate rate at 17.4 percent, and comparable to the owner-occupied rate of 13.3 percent. The largest portion of the bank's HMDA-reportable loans were originated in middle-income census tracts at 46.5 percent, which is comparable to the aggregate and the percentage of owner-occupied units located in middle-income census tracts at 45.4 percent and 45.9 percent, respectively. Finally, the bank originated 38.1 percent of HMDA-reportable loans in upper-income census tracts, which is above the aggregate at 35.1 percent and comparable to the owner-occupied percentage of 39.1 percent.

It should be noted that while the bank does represent a higher proportion of the assessment area's deposit base among FDIC-insured depository institutions, there is a notable level of competition when also considering other mortgage lenders and credit unions operating within the market. More specifically, in 2024, the fifteen HMDA-reporters who originated or purchased more HMDA-reportable loans than Guaranty Bank represent 50.9 percent of the total aggregate number of HMDA-reportable loans within the assessment area.

Guaranty Bank's 2023 overall HMDA-reportable lending performance was generally comparable to 2024 lending performance. However, home purchase lending to low- and moderate-income geographies was slightly better in 2023, while refinance lending to low- and moderate-income geographies was stronger in 2024.

Home Purchase Loans

In 2024, Guaranty Bank originated 1.3 percent of its home purchase loans in low-income census tracts, which is slightly below the aggregate, but comparable to the percentage of owner-occupied

units located in low-income census tracts at 2.3 percent and 1.6 percent, respectively. The bank originated 9.9 percent of its home purchase loans in moderate-income census tracts, which is below the aggregate at 19.5 percent and the percentage of owner-occupied units in moderate-income census tracts at 13.3 percent. The largest portion of the bank's home purchase loans were originated in middle-income census tracts at 48.0 percent, which is above the aggregate and the percentage of owner-occupied units located in middle-income census tracts at 44.5 percent and 45.9 percent, respectively. Finally, the bank originated 40.8 percent of its home purchase loans in upper-income census tracts, which is above the aggregate at 33.7 percent and slightly above the percentage of owner-occupied units located in upper-income census tracts at 39.1 percent.

Refinance Loans

In 2024, Guaranty Bank originated 2.0 percent of its refinance loans in low-income census tracts, which is comparable to the aggregate at 2.1 percent and the percentage of owner-occupied units located in low-income census tracts at 1.6 percent. The bank originated 21.6 percent of its refinance loans in moderate-income census tracts, which is above the aggregate and the percentage of owner-occupied units located in moderate-income census tracts at 14.8 percent and 13.3 percent, respectively. The bank originated the largest portion of its refinance loans, 43.1 percent, in middle-income census tracts, which is below the aggregate at 47.0 percent and slightly below the percentage of owner-occupied units at 45.9 percent. Finally, 33.3 percent of the bank's refinance loans were originated in upper-income census tracts, which is slightly below the aggregate and below the percentage of owner-occupied units located in upper-income census tracts at 36.1 percent and 39.1 percent, respectively.

The following table presents the bank's geographic distribution of HMDA-reportable loans in 2023 and 2024.

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Springfield, MO MSA 44180													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#%	\$(000)	\$%	\$%	#	%	#%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	2	14	2.2	203	0.5	12	2	13	2.3	85	0.2	13	16
Moderate	16	113	19.4	2,458	6.5	12.9	15	9.9	19.5	2,599	6.2	12.5	13.3
Middle	62	44.0	45.4	15,352	40.5	44.7	73	48.0	44.5	17,702	42.5	43.9	45.9
Upper	61	43.3	32.9	19,936	52.5	41.0	62	40.8	33.7	21,238	51.0	42.2	39.1
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	141	100.0	100.0	37,949	100.0	100.0	152	100.0	100.0	41,624	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	15	0	0.0	10	1	2.0	2.1	36	0.3	12	16
Moderate	3	10.7	15.0	111	3.2	9.7	11	21.6	14.8	1,373	13.3	11.1	13.3
Middle	17	60.7	45.8	1,989	57.5	43.6	22	43.1	47.0	3,676	35.7	45.5	45.9
Upper	8	28.6	37.7	1,359	39.3	45.7	17	33.3	36.1	5,217	50.6	42.2	39.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	28	100.0	100.0	3,459	100.0	100.0	51	100.0	100.0	10,302	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.7	0	0.0	0.4	0	0.0	0.7	0	0.0	0.6	16
Moderate	0	0.0	11.6	0	0.0	8.9	0	0.0	11.0	0	0.0	6.9	13.3
Middle	0	0.0	47.1	0	0.0	44.6	1	50.0	48.4	50	32.7	44.9	45.9
Upper	1	100.0	40.4	25	100.0	44.9	1	50.0	39.7	103	67.3	47.3	39.1
Unknown	0	0.0	0.2	0	0.0	1.2	0	0.0	0.1	0	0.0	0.3	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	25	100.0	100.0	2	100.0	100.0	153	100.0	100.0	100.0
Multifamily Loans													
Low	0	0.0	23.0	0	0.0	215	0	0.0	8.1	0	0.0	4.7	14.7
Moderate	0	0.0	32.4	0	0.0	213	4	40.0	32.4	14,456	44.7	29.3	27.4
Middle	1	33.3	35.1	398	24.0	22.6	4	40.0	43.2	2,991	9.3	48.5	44.2
Upper	2	66.7	6.8	1,262	76.0	31.7	2	20.0	14.9	14,865	46.0	16.7	9.6
Unknown	0	0.0	2.7	0	0.0	2.9	0	0.0	1.4	0	0.0	0.7	4.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	1,660	100.0	100.0	10	100.0	100.0	32,312	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	2	12	2.1	203	0.5	2.6	3	14	2.1	121	0.1	15	16
Moderate	19	11.0	17.5	2,569	6.0	12.7	30	14.0	17.4	18,428	21.8	13.3	13.3
Middle	80	46.2	45.6	17,739	41.2	43.0	100	46.5	45.4	24,419	28.9	44.6	45.9
Upper	72	41.6	34.8	22,582	52.4	41.4	82	38.1	35.1	41,423	49.1	40.5	39.1
Unknown	0	0.0	0.1	0	0.0	0.3	0	0.0	0.0	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	173	100.0	100.0	43,093	100.0	100.0	215	100.0	100.0	84,391	100.0	100.0	100.0

Source: 2024 FFIEC Census Data

2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Small Business Lending

The geographic distribution of small business loans reflects excellent penetration throughout the assessment area. In 2024, Guaranty Bank originated 1.9 percent of its small business loans in low-income census tracts, which is comparable to the aggregate at 1.3 percent and the percentage of total businesses located in low-income census tracts at 2.0 percent. The bank originated 34.7 percent of its small business loans in moderate-income census tracts, which is significantly above both the aggregate at 18.8 percent and the percentage of total businesses located in moderate-income census tracts at 22.6 percent. Additionally, the bank originated 33.8 percent of its small business loans in middle-income census tracts, which is significantly below the aggregate and the percentage of total businesses located in middle-income census tracts at 44.3 percent and 46.7 percent, respectively. The bank originated 27.3 percent of its small business loans in upper-income census tracts, which is below the aggregate at 33.6 percent, but comparable to the percentage of total businesses located in upper-income census tracts at 26.6 percent. Finally, Guaranty Bank originated 2.3 percent of small business loans to businesses located in unknown-income census tracts, which is comparable to the aggregate at 1.7 percent and to the percentage of small businesses located in unknown-income census tracts at 2.0 percent.

The following table presents the bank’s geographic distribution of small business loans in 2024.

Distribution of 2024 Small Business Lending By Income Level of Geography							
Assessment Area: Springfield, MO MSA 44180							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	4	1.9	1.3	1,280	2.3	1.6	2.0
Moderate	75	34.7	18.8	17,060	30.9	28.2	22.6
Middle	73	33.8	44.3	19,032	34.5	40.2	46.7
Upper	59	27.3	33.6	15,869	28.8	27.0	26.6
Unknown	5	2.3	1.7	1,925	3.5	2.9	2.0
Tract-Unk	0	0.0	0.3	0	0.0	0.0	
Total	216	100.0	100.0	55,166	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Lending to Borrowers of Different Income Levels and to Businesses of Different Sizes

Guaranty Bank’s lending activities reflect adequate distribution, particularly in its assessment area, of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

When determining performance, the comparison to aggregate lender figures was weighted more heavily than the assessment area demographics as it is a better measure of loan demand. In addition, due to low volume, home improvement loans were not considered within the analysis of HMDA-reportable lending.

A detailed discussion of HMDA-reportable and CRA-reportable small business lending in relation to borrowers of different income levels and businesses of different sizes is provided below.

HMDA-Reportable Loans

The distribution of HMDA-reportable loans reflects good penetration among individuals of different income levels, including low- and moderate-income borrowers. In 2024, the bank originated 2.0 percent of its total HMDA-reportable loans to low-income borrowers, which is below the aggregate at 5.7 percent and significantly below the percentage of low-income families in the assessment area at 18.4 percent. The bank originated 16.1 percent of its total HMDA-reportable loans to moderate-income borrowers, which is slightly below the aggregate at 17.4 percent and below the percentage of moderate-income families within the assessment area at 18.3 percent. The bank originated 21.0 percent of its total HMDA-reportable loans to middle-income borrowers, which is comparable to the aggregate at 20.5 percent and the percentage of middle-income families within the assessment area at 21.7 percent. The bank originated 39.0 percent of its total HMDA-reportable loans to upper-income borrowers, which is above the aggregate at 32.4 percent, but below the percentage of upper-income families in the assessment area at 41.7 percent. Finally, the bank originated 22.0 percent of its total HMDA-reportable loans to individuals of unknown-income, which is below the aggregate at 24.0 percent.

The bank's 2023 lending performance was generally comparable to 2024 lending performance; however, the bank's 2023 HMDA-reportable lending to low-income borrowers was stronger across all HMDA-reportable loan types. In 2023, the bank originated 8.2 percent of its total HMDA-reportable loans to low-income borrowers, which is comparable to the aggregate at 8.7 percent, but below the percentage of low-income families in the assessment area at 18.4 percent. The bank originated 18.8 percent of its total HMDA-reportable loans to moderate-income borrowers, which is comparable to the aggregate at 18.7 percent and the percentage of moderate-income families within the assessment area at 18.3 percent.

Home Purchase Loans

In 2024, the bank originated 2.0 percent of its home purchase loans to low-income borrowers, which is below the aggregate at 5.2 percent and significantly below the percentage of low-income families in the assessment area at 18.4 percent, respectively. The bank originated 17.1 percent of its home purchase loans to moderate-income borrowers, which is comparable to the aggregate at 17.8 percent, but slightly below the percentage of moderate-income families within the assessment area at 18.3 percent. The bank originated 22.4 percent of its home purchase loans to middle-income

borrowers, which is slightly above the aggregate at 20.9 percent, but comparable to the percentage of middle-income families within the assessment area at 21.7 percent. The bank originated 44.1 percent of its home purchase loans to upper-income borrowers, which is significantly above the aggregate at 31.1 percent and above the percentage of upper-income families in the assessment area at 41.7 percent. Finally, the bank originated 14.5 percent of its home purchase loans to individuals of unknown income, which is significantly below the aggregate at 25.0 percent.

Refinance Loans

In 2024, the bank originated 2.0 percent of its refinance loans to low-income borrowers, which is below the aggregate at 6.7 percent and significantly below the percentage of low-income families in the assessment area at 18.4 percent, respectively. The bank originated 11.8 percent of its refinance loans to moderate-income borrowers, which is below both the aggregate at 16.2 percent and the percentage of moderate-income families within the assessment area at 18.3 percent. The bank originated 15.7 percent of its refinance loans to middle-income borrowers, which is comparable to the aggregate at 16.6 percent, but below the proportion of middle-income families within the assessment area at 21.7 percent. The bank originated 25.5 percent of its refinance loans to upper-income borrowers, which is below the aggregate at 30.0 percent and significantly below the percentage of upper-income families in the assessment area at 41.7 percent. Finally, the bank originated 45.1 percent of its refinance loans to individuals of unknown-income, which is significantly above aggregate lending at 30.6 percent.

The following table presents the bank's borrower distribution of HMDA-reportable loans in 2023 and 2024.

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Springfield, MO MSA 44180													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	11	7.8	8.1	1178	3.1	4.3	3	2.0	5.2	240	0.6	2.4	18.4
Moderate	28	19.9	18.7	5,194	13.7	13.8	26	17.1	17.8	5,240	12.6	12.3	18.3
Middle	28	19.9	19.8	6,295	16.6	18.6	34	22.4	20.9	7,656	18.4	18.4	21.7
Upper	58	41.1	26.9	21,677	57.1	37.7	67	44.1	31.1	21,855	52.5	42.0	41.7
Unknown	16	11.3	26.5	3,605	9.5	25.6	22	14.5	25.0	6,633	15.9	24.8	0.0
Total	141	100.0	100.0	37,949	100.0	100.0	152	100.0	100.0	41,624	100.0	100.0	100.0
Refinance Loans													
Low	3	10.7	10.6	200	5.8	5.2	1	2.0	6.7	30	0.3	3.3	18.4
Moderate	3	10.7	19.2	340	9.8	14.6	6	11.8	16.2	1,091	10.6	10.3	18.3
Middle	1	3.6	21.6	103	3.0	18.9	8	15.7	16.6	1,206	11.7	13.0	21.7
Upper	4	14.3	28.1	996	28.8	36.9	13	25.5	30.0	4,001	38.8	37.1	41.7
Unknown	17	60.7	20.6	1,820	52.6	24.3	23	45.1	30.6	3,974	38.6	36.2	0.0
Total	28	100.0	100.0	3,459	100.0	100.0	51	100.0	100.0	10,302	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	8.0	0	0.0	4.1	0	0.0	5.4	0	0.0	3.5	18.4
Moderate	1	100.0	19.1	25	100.0	12.7	1	50.0	17.1	103	67.3	9.8	18.3
Middle	0	0.0	24.1	0	0.0	18.8	1	50.0	22.9	50	32.7	17.3	21.7
Upper	0	0.0	39.8	0	0.0	55.2	0	0.0	44.1	0	0.0	55.2	41.7
Unknown	0	0.0	9.0	0	0.0	9.7	0	0.0	10.4	0	0.0	14.3	0.0
Total	1	100.0	100.0	25	100.0	100.0	2	100.0	100.0	153	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	14	8.2	8.7	1,378	3.3	4.5	4	2.0	5.7	270	0.5	2.7	18.4
Moderate	32	18.8	18.7	5,559	13.4	13.9	33	16.1	17.4	6,434	12.4	11.8	18.3
Middle	29	17.1	20.4	6,398	15.4	18.5	43	21.0	20.5	8,912	17.1	17.3	21.7
Upper	62	36.5	29.0	22,673	54.7	38.4	80	39.0	32.4	25,856	49.6	41.7	41.7
Unknown	33	19.4	23.2	5,425	13.1	24.7	45	22.0	24.0	10,607	20.4	26.5	0.0
Total	170	100.0	100.0	41,433	100.0	100.0	205	100.0	100.0	52,079	100.0	100.0	100.0
Source: 2024 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.													

Small Business Loans

The distribution of small business loans reflects adequate penetration among businesses of different revenue sizes. In 2024, Guaranty Bank originated 39.4 percent of its small business loans to businesses with gross annual revenues of \$1 million or less, which is below the aggregate lender at 51.6 percent. However, when considering the dollars loaned to businesses with revenues of \$1 million or less, Guaranty Bank is comparable to the aggregate in dollars lent, with 31.0 percent and 33.3 percent, respectively. While Guaranty Bank may make slightly fewer loans to businesses with \$1 million or less in revenue compared to the aggregate, the amount of credit extended is

comparable. This difference in the bank’s lending compared to the aggregate lending is also shown in loans in amounts of \$100,000 or less to businesses with revenues of \$1 million or less. Guaranty Bank made almost half of their loans to small businesses in amounts of \$100,000 or less, which are generally considered most beneficial for small businesses. Guaranty Bank’s performance is reflective of the competitive nature of the market within the assessment area. In 2024, the bank is ranked 11th of 101 CRA-reporters operating in the Springfield, MO MSA. The 10 institutions above Guaranty Bank originated 74.2 percent of the total CRA-reportable lending in the assessment area, and 81.4 percent of the small business loans to small businesses.

The following table presents the bank’s borrower distribution of small business loans in 2024.

Distribution of 2024 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Springfield, MO MSA 44180							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	85	39.4	51.6	17,094	31.0	33.3	91.5
Over \$1 Million	114	52.8		36,109	65.5		7.7
Revenue Unknown	17	7.9		1,963	3.6		0.7
Total	216	100.0		55,166	100.0		100.0
By Loan Size							
\$100,000 or Less	100	46.3	89.1	4,766	8.6	26.4	
\$100,001 - \$250,000	38	17.6	5.3	7,295	13.2	17.0	
\$250,001 - \$1 Million	78	36.1	5.6	43,105	78.1	56.6	
Total	216	100.0	100.0	55,166	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	42	49.4		1,970	11.5		
\$100,001 - \$250,000	23	27.1		4,271	25.0		
\$250,001 - \$1 Million	20	23.5		10,853	63.5		
Total	85	100.0		17,094	100.0		
<i>Source: 2024 FFIEC Census Data 2024 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey</i>							
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

Community Development Lending

Guaranty Bank is a leader in making community development loans. During the evaluation period, the bank originated 41 qualified community development loans totaling approximately \$173.6 million. The qualified loans addressed a range of credit needs including affordable housing

for low- or moderate-income individuals, community services targeted to low- or moderate-income individuals or geographies, and revitalization/stabilization efforts. Three loans totaling \$833,904 were particularly responsive as they helped provide affordable housing for low- or moderate-income individuals, which was a need highlighted by community representatives within the assessment area. Additionally, Guaranty Bank made 34 loans totaling approximately \$172.0 million to revitalization/stabilization efforts occurring within the assessment area, which represents a decrease in comparison to the previous evaluation, during which time the bank originated 85 loans for approximately \$221.6 million. When adjusting for review length variance, it accounts for a decrease of 41.5 percent by number and 5.0 percent by dollar volume. However, the previous evaluation period overlapped with the COVID-19 pandemic, which presented an increase in community development lending due to record low interest rates.

The following table presents the bank’s community development loans throughout its assessment area during the review period.

Community Development Loans May 2, 2023, through January 20, 2026										
Area	Affordable Housing		Community Services		Economic Development		Revitalize/ Stabilize		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Assessment Area	3	834	4	775	0	0	34	172,008	41	173,617

INVESTMENT TEST

Guaranty Bank made an excellent level of qualified community development investments, grants and donations, particularly those not routinely provided by private investors, occasionally in a leadership position. The bank makes significant use of innovative and/or complex instruments to support community initiatives and demonstrates excellent responsiveness to credit and community development needs.

During the evaluation period, the bank made or maintained 10 community development investments totaling approximately \$10.1 million within the assessment area. Of the qualified community development investments, two investments were made within the current review period whereas the remaining investments were made prior to the current evaluation period yet were still maintained by the bank. The majority of qualified investments, by dollar and number, were made toward affordable housing efforts benefiting, or likely to benefit, low- or moderate-income individuals or geographies. For example, the bank made a low-income housing tax credit (LIHTC) investment of \$4.4 million for construction of affordable housing apartments primarily benefiting low- and moderate-income individuals, located within a moderate-income geography. This was identified as a need within the assessment area by each of the community representatives. In addition, the remaining qualified investments supported economic development efforts which support small businesses and revitalize or stabilize efforts within the assessment area. As an example, the bank made an investment of \$6.5 million in a finance and

development corporation focusing on financing small businesses, including start-ups, which serves an area which contains low- and moderate-income tracts and promotes job creation and retention. Guaranty Bank increased the number and dollar volume of investments when compared to the seven investments totaling \$3.3 million made or maintained during the previous evaluation. When accounting for review length variance, the bank increased its qualified investments 73.2 percent by number and 267.6 percent by dollar amount.

The following table presents the bank’s community development investments throughout its assessment area during the review period.

Community Development Investments May 2, 2023, through January 20, 2026											
Area		Affordable Housing		Community Services		Economic Development		Revitalize/ Stabilize		Total	
		#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Assessment Area	Current	2	2,500	0	0	0	0	0	0	2	2,500
	Prior	3	5,945	0	0	2	13	3	1,636	8	7,593
	Total	5	8,445	0	0	2	13	3	1,636	10	10,093

Note: Dollar amounts are rounded and not reflective of exact figures.

Additionally, the bank made 137 donations totaling \$273,159 to organizations within the assessment area during the evaluation period. Donations were made to a variety of organizations with the majority of donations, by dollar amount, going towards community service efforts targeting low- and moderate-income individuals and communities (67.4 percent), as well as affordable housing benefiting low- or moderate-income individuals or communities. During the previous evaluation the bank made 145 community development donations totaling approximately \$256,099. When accounting for review length variance the bank increased its qualified donations 14.5 percent by number and 29.3 percent by dollar volume.

SERVICE TEST

Guaranty Bank’s retail delivery services are readily accessible to geographies and individuals of different income levels in its assessment area. To the extent changes have been made, its record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income individuals. Bank services (including, where appropriate, business hours) do not vary in a way that inconveniences its assessment area(s), particularly low- or moderate-income geographies or low- or moderate-income individuals. The bank provides a relatively high level of community development services in the assessment area.

Retail Services

Guaranty Bank’s retail delivery services are readily accessible to geographies and individuals of

different income levels in its assessment area. The bank operates its main office, nine branch offices, and nine ATMs in the assessment area. One branch and ATM are located in a low-income census tract, four branches and ATMs are located in moderate-income census tracts, and the main office, four branches, and four ATMs are located in middle- or upper-income census tracts. To the extent changes have been made, its record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income individuals. Since the previous evaluation, the bank has not opened or closed any branches or ATMs within the assessment area.

Its services do not vary in a way that inconveniences its assessment area, particularly low- or moderate-income geographies or low- or moderate-income individuals. Offices in the assessment area generally have standard hours of 9:00 a.m. to 5:00 p.m., Monday through Friday, with the drive-thru window opening and closing 30 minutes earlier or later, respectively. Certain offices have extended hours from 9:00 a.m. to 12:00 p.m. on Saturdays, with drive-up access, including the branch located in the low-income census tract and three of the four branches located in moderate-income census tracts.

As noted in the table below, the percentage of branches in low- or moderate-income census tracts exceeds the percentage of census tracts or families within low- or moderate-income tracts.

Distribution of Branches and Full-Service ATMs					
Tract Income Level	# of Branches	% of Total Branches	Census Tracts	% of Total Census Tracts	% of Families by Tract Income
Low	1	10.0	5	5.2	2.7
Moderate	4	40.0	21	21.6	16.7
Middle	3	30.0	40	41.2	45.3
Upper	2	20.0	29	29.9	35.2
Unknown	0	0.0	2	2.1	0.1
Total	10	100.0	97	100.0	100.0

Community Development Services

Guaranty Bank provides a relatively high level of community development services. During the review period, the bank provided 2,001 community development service hours. As illustrated in the following table, community development services were conducted in partnership with a variety of organizations; however, the majority of community development services had a focus of community services targeting low- and moderate-income individuals and geographies. Many of the bank service hours were performed by bank employees serving in board or leadership roles within these organizations, showing continuing commitment to the organizations and community. During the previous evaluation, the bank provided 3,050 community development service hours. When adjusting for variance in review period length, the bank's current performance in community development service hours decreased by 20.5 percent when compared to the previous

evaluation.

The following table presents the bank's community development services throughout its assessment area during the review period.

Community Development Services					
May 2, 2023, through January 20, 2026					
Area	Affordable Housing	Community Services	Economic Development	Revitalize/Stabilize	Total
	Hours	Hours	Hours	Hours	Hours
Assessment Area	108	1,871	22	0	2,001

JOPLIN, MO-KS MSA #27900 - Full Review

SCOPE OF THE EXAMINATION

Full-scope examination procedures were used to evaluate the bank's performance in the Joplin, MO-KS MSA assessment area. The review of this assessment area is consistent with the scope discussed in the "Scope of Examination" section of this performance evaluation.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN JOPLIN, MO-KS, MSA #27900

Guaranty Bank's assessment area located in the Joplin, Missouri-Kansas MSA (Joplin MO-KS MSA) remains unchanged from the previous evaluation and consists of Jasper and Newton counties in their entirety. Since the previous evaluation, and as a result of Office of Management and Budget (OMB) Bulletin 23-01, the Joplin MO-KS MSA was revised to include Cherokee County, Kansas; however, Cherokee County is not included within the bank's assessment area. The bank maintains five branch locations, each with a full-service ATM within the assessment area. One branch and ATM are located in a moderate income-census tract, while three branches and ATMs are located in middle-income census tracts. Finally, one branch and ATM are located in an upper-income census tract. The assessment area includes the principal city of Joplin, Missouri, and as of 2024, consists of seven moderate-income, 28 middle-income, and seven upper-income census tracts. There are no low-income census tracts. Between 2023 and 2024 a middle-income census tract was classified as an upper-income census tract based on 2024 FFIEC Census Data and 2024 Dun & Bradstreet (D&B) information.

Although the bank did not change its assessment area, the composition changed due to updates from the American Community Survey (ACS). Census tract changes are noted in the following table:

Tract Designation Change Data¹

The median family income levels (MFI) for census tracts are calculated using the income data from the United States Census Bureau's American Community Survey and geographic definitions from the Office of Management and Budget (OMB) and are updated approximately every five years (.12(m) Income Level). The income data used to calculate geographic income designations changed between 2021 and 2022. Accordingly, lending activity that took place in calendar years up to and including 2021 are evaluated based on ACS income level definitions from the five-year survey data set 2011-2015. Lending activity performed in 2022 and beyond are evaluated based on ACS income level definitions from the five-year survey data set 2016-2020.

¹ *Census tract designations are based on American Community Survey income data. For years 2022 and after, the designations are based on 2016-2020 ACS data. For years 2021 and before, the designations are based on 2011-2015 ACS data. For examinations that include performance before and after 2022, both sets of data have been used to perform the analysis of bank activity in the respective timeframes.*

Census Tract Designation Changes			
American Community Survey Data (ACS)			
Tract Income Designation	2023 Designations (#)	2024 Designations (#)	Net Change (#)
Low	0	0	0
Moderate	7	7	0
Middle	29	28	-1
Upper	6	7	+1
Unknown	0	0	0
Total	42	42	0
<i>Source: U. S. Census Bureau: Decennial Census: American Community Survey Data: 2011-2015</i> <i>U.S. Census Bureau: Decennial Census: America Community Survey Data: 2016-2020</i>			

According to the June 30, 2025, FDIC Deposit Market Share Report, Guaranty Bank ranks ninth among 17 FDIC-insured financial institutions operating with the assessment area. The bank held \$168.9 million in deposits representing 3.9 percent of the total deposit market share. In comparison, the number one institution, Southwest Missouri Bank, holds \$998.7 million in deposits representing 23.2 percent of the market share. First Community Bank ranked eighth in deposit market share with \$176.4 million in deposits, representing 4.1 percent deposit market share. Simmons Bank, the 10th ranked institution, held \$146.1 million in deposits, representing a 3.4 percent market share.

In 2024, Guaranty Bank ranked 36th among 232 HMDA-reporters, originating 15 HMDA-reportable loans in the assessment area. The bank was tied with 21st Mortgage Corporation and Discover Bank. In comparison, Flat Branch Mortgage, Inc., the assessment area leader in HMDA-reportable loans, originated 931 HMDA-reportable loans. Citibank, National Association is the 35th ranked institution with 17 HMDA-reportable loan purchased within the assessment area. Additionally, in 2024, Guaranty Bank ranked 11th among 75 CRA-reporters, originating 84 CRA-reportable loans in the assessment area. By comparison 10th ranked Lake Forest Bank & Trust Company and 12th ranked Oakstar Bank originated 85 and 75 CRA-reportable loans, respectively. American Express National Bank originated 780 CRA-reportable loans and was ranked first.

Additional assessment area demographic information is provided in the following table. Demographic data for 2023 can be found in Appendix A.

2024 Joplin, MO-KS MSA 27900 AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	8,467	18.7
Moderate	7	16.7	7,083	15.6	1,789	25.3	8,883	19.6
Middle	28	66.7	29,817	65.7	2,754	9.2	9,781	21.6
Upper	7	16.7	8,462	18.7	595	7.0	18,231	40.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	42	100.0	45,362	100.0	5,138	11.3	45,362	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied		Rental		Vacant		
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	14,217	5,812	12.8	40.9	6,680	47.0	1,725	12.1
Middle	48,862	30,461	66.9	62.3	13,433	27.5	4,968	10.2
Upper	13,494	9,283	20.4	68.8	2,915	21.6	1,296	9.6
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	76,573	45,556	100.0	59.5	23,028	30.1	7,989	10.4
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	1,234	21.0	1,100	20.4	123	28.1	11	15.9
Middle	3,729	63.4	3,432	63.8	247	56.5	50	72.5
Upper	923	15.7	848	15.8	67	15.3	8	11.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	5,886	100.0	5,380	100.0	437	100.0	69	100.0
Percentage of Total Businesses:			91.4		7.4		1.2	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	4	2.0	4	2.0	0	0.0	0	0.0
Middle	168	83.2	166	83.0	2	100.0	0	0.0
Upper	30	14.9	30	15.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	202	100.0	200	100.0	2	100.0	0	0.0
Percentage of Total Farms:			99.0		1.0		0.0	
<i>Source: 2024 FFIEC Census Data 2024 Data & Business Data 2016-2020 U.S. Census Bureau: American Community Survey</i>								
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

Population Characteristics

The following table presents the population trends for the assessment area, the counties comprising the assessment area, the Joplin, MO-KS MSA, and the state of Missouri from 2015 to 2020. According to the U.S. Census Bureau demographic data, the assessment area grew by 3.1 percent, from 175,961 to 181,409. The assessment area’s percentage increase in population is above the state of Missouri, which saw a 1.8 percent increase during the same period. This growth was primarily driven by Jasper County, which grew 4.8 percent, compared to Newton County, which saw a decrease in population of 0.2 percent. The Joplin, MO-KS MSA saw a 2.0 percent increase. A community representative acknowledged the Joplin population has increased, citing an increase in new employers coming to the area.

Population Change			
Area	2015 Population	2020 Population	Percent Change
Assessment Area	175,961	181,409	3.1
Jasper County, MO	117,184	122,761	4.8
Newton County, MO	58,777	58,648	-0.2
Joplin, MO-KS MSA	196,913	200,771	2.0
State of Missouri	6,045,448	6,154,913	1.8

*Source: 2011-2015 U.S. Census Bureau American Community Survey
2020 U.S. Census Bureau Decennial Census*

Income Characteristics

According to the U.S. Census Bureau, the assessment area is comprised of 45,362 families, of which 18.7 percent are designated as low-income, 19.6 percent are moderate-income, 21.6 percent are middle-income, and 40.2 percent are upper-income. However, 11.3 percent of families residing within the assessment area live below the poverty line. According to the 2016-2020 ACS, the MFI for the assessment area is \$61,062, which is below the state of Missouri’s MFI of \$72,834. The assessment area, the MSA as a whole, and the state of Missouri experienced growth in MFI from 2015 to 2020. The assessment area’s MFI increase of 8.0 percent was comparable to the MSA as a whole at 7.9 percent, but below the state of Missouri’s growth of 9.6 percent during the same time period. Within the two counties of the assessment area, Newton County increased by a greater percentage compared to Jasper County, 17.3 percent compared to 5.0 percent. A community representative stated that while wage growth has occurred, most available roles pay salaries at the low- or moderate-income levels. The representative also noted that workers who have lost their jobs see similar roles in their field pay noticeably less than their previous positions. Higher-paying jobs in the area are competitive, and do not remain unfilled for long.

Median Family Income Change			
Area	2015 Median Family Income (\$)	2020 Median Family Income (\$)	Percent Change
Assessment Area	56,550	61,062	8.0
Jasper County, MO	57,078	59,926	5.0
Newton County, MO	55,440	65,045	17.3
Joplin, MO-KS MSA	56,354	60,833	7.9
State of Missouri	66,438	72,834	9.6

*Source: 2011 - 2015 U.S. Census Bureau American Community Survey
2016 - 2020 U.S. Census Bureau American Community Survey
Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.*

Housing Characteristics

The bank’s assessment area includes 76,573 housing units. A majority of housing units are owner-occupied at 59.5 percent, whereas rental units account for 30.1 percent of total housing stock. Within the assessment area, 10.4 percent of housing units are vacant, which is below the percentage of vacant units across the state of Missouri at 13.0 percent.

The following table presents recent housing cost burden for individuals within the assessment area, the two counties comprising the assessment area, the Joplin, MO-KS MSA, and the state of Missouri. The housing cost burden is the ratio of a household’s gross monthly housing costs to the household’s gross monthly income. Housing cost burden, as defined by the Department of Housing and Urban Development (HUD), takes these quantitative ratios, and assigns qualitative values to them. If a household’s housing cost is above 30.0 percent of its income, then that household is considered housing cost burdened. As evidenced by the table below, low-income individuals are impacted at a higher rate than moderate-income individuals as both renters and owners. Low-income renters within the assessment area were comparable to low-income renters within the state of Missouri as a whole, but within the assessment area moderate-income renters met the cost burden criteria at a higher rate, 41.7 percent compared to 30.3 percent. Owners in the assessment area, with the exception of moderate-income owners, had a lower percentage meeting the housing cost burden criteria when compared to the state of Missouri as a whole. Of the counties comprising the assessment area, Jasper County had a higher percentage of renters experiencing housing cost burden, whereas Newton County has a higher percentage of owners who experienced housing cost burden.

A community representative noted that the city of Joplin had suffered from a catastrophic tornado in 2011, destroying a significant amount of housing within the city. A lingering impact was that there are very few older homes or apartment complexes within the city. Typically, older buildings are less desirable and, as a result, are often more affordable compared to newer properties. With the older stock depleted, the representative was aware that the assessment area, particularly Jasper County, had a higher percentage of moderate-income renters who were spending greater than 30.0

percent of their income on housing.

Housing Cost Burden						
Area	Cost Burden – Renters (%)			Cost Burden – Owners (%)		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Assessment Area	75.0	41.7	39.4	53.0	29.8	13.7
Jasper County, MO	74.8	48.5	41.1	49.9	25.1	12.5
Newton County, MO	75.8	28.0	34.2	59.5	36.7	15.9
Joplin, MO-KS MSA	73.7	38.1	39.2	52.7	28.0	13.7
State of Missouri	74.0	30.3	39.6	58.6	26.5	16.1
<i>Cost Burden is housing cost that equals 30 percent or more of household income</i>						
<i>Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy</i>						

Employment Conditions

The following table shows unemployment statistics for the assessment area, Jasper and Newton counties, the Joplin, MO-KS MSA, and the state of Missouri. The assessment area’s unemployment rate in 2024 of 3.6 percent remained slightly under the state of Missouri’s unemployment rate of 3.7 percent. A community representative indicated that employment had been relatively stable, and while there were some job losses, they were primarily related to smaller employers.

Unemployment Rates (%)				
Area	2021	2022	2023	2024
Assessment Area	3.5	2.4	3.0	3.6
Jasper County, MO	3.5	2.3	3.0	3.5
Newton County, MO	3.7	2.5	3.1	3.7
Joplin, MO-KS MSA	3.5	2.4	3.0	3.6
State of Missouri	4.2	2.6	3.1	3.7
<i>Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics</i>				

Industry Characteristics

The assessment area contains a diverse employment base and is most heavily impacted by the industries of manufacturing, retail trade, and health care and social assistance based on data from the U.S. Bureau of Labor Statistics. There is also a sizeable level of government employees. A community representative mentioned that employers had come into the area and there had been no significant layoffs or cuts. When job losses occurred it was on a smaller scale with smaller employers.

Community Representatives

Information from one community representative was considered during the evaluation to provide information regarding local demographic and affordable housing conditions. The representative provided information on housing, employment, and other needs within the assessment area. The representative stated that local financial institutions generally do a satisfactory job of providing financing to those who qualify, and that institutions were willing to partner with organizations to help address the credit needs of the local communities within the assessment area. This includes through a few loan programs that encourage or assist first-time homebuyers or potential borrowers with difficult credit histories. The representative identified affordable housing opportunities and resources for seniors or people on fixed incomes as being the two largest needs of the community.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN JOPLIN, MO-KS MSA #27900

LENDING TEST

The geographic distribution reflects good penetration throughout the assessment area. The distribution of borrowers reflects adequate penetration among individuals of different income levels and businesses of different sizes. Guaranty Bank exhibits an adequate record of serving the credit needs of low-income individuals and areas and very small businesses. The bank makes a relatively high level of community development loans and makes limited use of innovative and/or flexible lending practices in serving assessment area credit needs.

Geographic Distribution of Loans

Guaranty Bank's lending activities reflect good distribution throughout the assessment area. An analysis of the geographic distribution of loans was conducted to determine the dispersion of loans among the census tract designations within the assessment area, particularly in low- and moderate-income census tracts. Originations of the bank's 2024 HMDA-reportable and CRA-reportable loans reach 69.0 percent of the 42 census tracts within the Joplin, MO-KS MSA assessment area. Lending occurred in six of the seven moderate-income census tracts in this assessment area. There were no conspicuous lending gaps in the bank's lending distribution across the assessment area, including moderate-income census tracts.

When determining performance, the comparison to aggregate lender figures was weighted more heavily than the assessment area demographics as it is a better measure of loan demand. In addition, due to low volume, home improvement and multi-family loans were not considered within the analysis of HMDA-reportable lending.

A detailed discussion of HMDA-reportable and CRA-reportable small business lending is provided below.

HMDA-Reportable Loans

The geographic distribution of HMDA-reportable loans reflects good dispersion throughout the assessment area. In 2024, Guaranty Bank originated 23.1 percent of its total HMDA-reportable loans in moderate-income census tracts, which is above the aggregate at 15.6 percent and significantly above the percentage of owner-occupied units located in moderate-income census tracts at 12.8 percent. The bank originated 61.5 percent of its HMDA-reportable loans in middle-income census tracts, which is below the aggregate of 66.1 percent and the owner-occupied rate of 66.9 percent. Finally, the bank originated 15.4 percent of HMDA-reportable loans in upper-income census tracts, which is below the aggregate at 18.3 percent and the percentage of owner-occupied units of 20.4 percent. There are no low-income census tracts in the assessment area.

The bank's 2023 lending performance was comparable to 2024 lending performance. For 2023 HMDA-reportable lending please refer to Appendix A.

Home Purchase Loans

In 2024, Guaranty Bank originated 20.0 percent of its home purchase loans in moderate-income census tracts, which is above the aggregate at 16.3 percent and the percentage of owner-occupied units located in moderate-income census tracts at 12.8 percent. The bank originated 60.0 percent of its home purchase loans in middle-income census tracts, which is below the aggregate at 65.9 percent and the owner-occupied rate of 66.9 percent. Finally, the bank originated 20.0 percent of home purchase loans in upper-income census tracts, which is above the aggregate at 17.8 percent, and comparable to the owner-occupied percentage of 20.4 percent.

Refinance Loans

In 2024, Guaranty Bank originated 28.6 percent of its refinance loans in moderate-income census tracts, which is significantly above the aggregate and the percentage of owner-occupied units located in moderate-income census tracts at 12.9 percent and 12.8 percent, respectively. The bank originated 57.1 percent of its refinance loans in middle-income census tracts, which is significantly below the aggregate and below the percentage of owner-occupied units at 67.4 percent and 66.9 percent, respectively. The bank originated 14.3 percent of its refinance loans in upper-income census tracts. This is below the aggregate at 19.7 percent and the percentage of owner-occupied units located in upper-income census tracts at 20.4 percent.

The following table presents the bank's geographic distribution of HMDA-reportable loans in 2024.

Distribution of 2024 Home Mortgage Lending By Income Level of Geography Assessment Area: Joplin, MO-KS MSA 27900							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$ (000)	%	%	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	20.0	16.3	247	20.6	12.8	12.8
Middle	3	60.0	65.9	735	61.4	65.9	66.9
Upper	1	20.0	17.8	216	18.0	21.4	20.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	1,198	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	28.6	12.9	173	19.0	9.2	12.8
Middle	4	57.1	67.4	537	58.9	68.8	66.9
Upper	1	14.3	19.7	202	22.1	22.0	20.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	7	100.0	100.0	912	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	17.2	0	0.0	15.0	12.8
Middle	0	0.0	64.1	0	0.0	64.8	66.9
Upper	0	0.0	18.6	0	0.0	20.1	20.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	31.3	0	0.0	25.7	32.8
Middle	1	100.0	54.2	53	100.0	66.0	59.1
Upper	0	0.0	14.6	0	0.0	8.3	8.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	53	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	3	23.1	15.6	420	19.4	12.5	12.8
Middle	8	61.5	66.1	1,325	61.3	66.3	66.9
Upper	2	15.4	18.3	418	19.3	21.2	20.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	13	100.0	100.0	2,163	100.0	100.0	100.0
Source: 2024 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Small Business Lending

The geographic distribution of small business loans reflects good penetration throughout the assessment area. In 2024, Guaranty Bank originated 20.4 percent of its small business loans in moderate-income census tracts, which is above the aggregate at 17.0 percent and comparable to the percentage of total businesses located in moderate-income census tracts at 21.0 percent. Additionally, the bank originated 68.5 percent of its small business loans in middle-income census tracts, which is above the aggregate and the percentage of total businesses located in middle-income census tracts at 62.9 percent and 63.4 percent, respectively. Finally, the bank originated 11.1 percent of its small business loans in upper-income census tracts, which is below the aggregate at 19.5 percent and the percentage of total businesses located in upper-income census tracts at 15.7 percent.

The following table presents the bank’s geographic distribution of small business loans in 2024.

Distribution of 2024 Small Business Lending By Income Level of Geography							
Assessment Area: Joplin, MO-KS MSA 27900							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	11	20.4	17.0	1,787	20.5	14.7	21.0
Middle	37	68.5	62.9	5,637	64.6	58.7	63.4
Upper	6	11.1	19.5	1,301	14.9	26.4	15.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.6	0	0.0	0.2	
Total	54	100.0	100.0	8,725	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Lending to Borrowers of Different Income Levels and Lending to Businesses of Different Sizes

Guaranty Bank’s lending activities reflect adequate distribution, particularly in its assessment area, of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

When determining performance, the comparison to aggregate lender figures was weighted more heavily than the assessment area demographics as it is a better measure of loan demand. In addition, due to low volume, home improvement loans were not considered within the analysis of HMDA-reportable lending.

A detailed discussion of HMDA-reportable and CRA-reportable small business lending in relation to borrowers of different income levels and businesses of different sizes is provided below.

HMDA-Reportable Loans

The distribution of HMDA-reportable loans reflects adequate penetration among individuals of different income levels, including low- and moderate-income borrowers. In 2024, the bank did not originate any HMDA-reportable loans to low-income borrowers, which is below the aggregate at 6.4 percent and significantly below the percentage of low-income families in the assessment area at 18.7 percent. The bank originated 8.3 percent of its total HMDA-reportable loans to moderate-income borrowers, which is significantly below the aggregate and the percentage of moderate-income families in the assessment area at 19.3 percent and 19.6 percent, respectively. The bank originated 41.7 percent of its total HMDA-reportable loans to middle-income borrowers, which is significantly above the aggregate at 19.9 percent and the proportion of middle-income families within the assessment area at 21.6 percent. The bank originated 25.0 percent of its total HMDA-reportable loans to upper-income borrowers, which is below the aggregate at 29.8 percent and significantly below the percentage of upper-income families in the assessment area at 40.2 percent. Finally, the bank originated 25.0 percent of its total HMDA-reportable loans to individuals of unknown-income, which is comparable to the aggregate at 24.6 percent.

The bank's 2023 lending performance was stronger in lending to low- and moderate-income individuals when compared to 2024. In 2023, the bank originated 9.1 percent of HMDA-reportable loans to low-income borrowers, which is above the aggregate at 6.5 percent, but significantly below the percentage of low-income families in the assessment area at 18.9 percent. The bank originated 27.3 percent of its total HMDA-reportable loans to moderate-income borrowers, which is above the aggregate and the percentage of moderate-income families in the assessment area at 19.1 percent and 19.7 percent, respectively. The bank originated 4.5 percent of its total HMDA-reportable loans to middle-income borrowers, which is significantly below the aggregate at 22.0 percent and the proportion of middle-income families within the assessment area at 21.7 percent. The bank originated 36.4 percent of its total HMDA-reportable loans to upper-income borrowers, which is above the aggregate at 29.8 percent but below the percentage of upper-income families in the assessment area at 39.8 percent. Finally, the bank originated 22.7 percent of its total HMDA-reportable loans to individuals of unknown-income, which is comparable to the aggregate at 22.7 percent.

For 2023 HMDA-reportable lending please refer to Appendix A.

Home Purchase Loans

In 2024, the bank did not originate any home purchase loans to low- or moderate-income borrowers, which is below and significantly below the aggregate at 5.9 percent and 20.8 percent,

respectively. This is also significantly below the percentage of families designated as low- or moderate-income at 18.7 percent and 19.6 percent, respectively. The bank originated 40.0 percent of its home purchase loans to middle-income borrowers, which is significantly above the aggregate at 19.2 percent and the percentage of middle-income families within the assessment area at 21.6 percent. The bank originated 40.0 percent of its home purchase loans to upper-income borrowers, which is significantly above the aggregate at 27.8 percent, but comparable to the percentage of upper-income families in the assessment area at 40.2 percent. Finally, the bank originated 20.0 percent of its home purchase loans to individuals of unknown income, which is below aggregate at 26.3 percent. While the bank did not originate any home purchase loans to low- or moderate-income borrowers in 2024, in 2023 the bank originated three home purchase loans to low- or moderate-income borrowers. Guaranty Bank's performance to moderate-income borrowers at 14.3 percent was below the aggregate at 19.5 percent; however, the bank outperformed the aggregate with low-income borrowers at 7.1 percent compared to 5.7 percent.

Refinance Loans

In 2024, the bank did not originate any refinance loans to low-income borrowers, which is below the aggregate at 8.2 percent and significantly below the percentage of low-income families in the assessment area at 18.7 percent. The bank originated 14.3 percent of its refinance loans to moderate-income borrowers, which is comparable to the aggregate at 15.0 percent, but below the percentage of moderate-income families within the assessment area at 19.6 percent. The bank originated 42.9 percent of its refinance loans to middle-income borrowers, which is significantly above the aggregate at 19.2 percent and the percentage of middle-income families within the assessment area at 21.6 percent. The bank originated 14.3 percent of its refinance loans to upper-income borrowers, which is significantly below the aggregate and the percentage of upper-income families in the assessment area at 27.3 percent and 40.2 percent, respectively. Finally, the bank originated 28.6 percent of its refinance loans to individuals of unknown income, which is below aggregate at 30.4 percent. In 2023, the bank originated 14.3 percent of its refinance loans to low-income borrowers, which is above the aggregate at 8.3 percent, while 57.1 percent of the bank's refinance loans were made to moderate-income borrowers, which is significantly above the aggregate at 17.7 percent.

The following table presents the bank's borrower distribution of HMDA-reportable loans in 2024.

Distribution of 2024 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Joplin, MO-KS MSA 27900							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$ (000)	%	%	
Home Purchase Loans							
Low	0	0.0	5.9	0	0.0	3.2	18.7
Moderate	0	0.0	20.8	0	0.0	15.3	19.6
Middle	2	40.0	19.2	341	28.5	18.5	21.6
Upper	2	40.0	27.8	641	53.5	37.0	40.2
Unknown	1	20.0	26.3	216	18.0	26.0	0.0
Total	5	100.0	100.0	1,198	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	8.2	0	0.0	3.6	18.7
Moderate	1	14.3	15.0	213	23.4	10.7	19.6
Middle	3	42.9	19.2	373	40.9	15.9	21.6
Upper	1	14.3	27.3	202	22.1	32.8	40.2
Unknown	2	28.6	30.4	124	13.6	37.0	0.0
Total	7	100.0	100.0	912	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	5.1	0	0.0	3.9	18.7
Moderate	0	0.0	18.4	0	0.0	14.3	19.6
Middle	0	0.0	25.1	0	0.0	20.3	21.6
Upper	0	0.0	44.9	0	0.0	51.3	40.2
Unknown	0	0.0	6.5	0	0.0	10.1	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans							
Low	0	0.0	6.4	0	0.0	3.3	18.7
Moderate	1	8.3	19.3	213	10.1	14.3	19.6
Middle	5	41.7	19.9	714	33.8	18.0	21.6
Upper	3	25.0	29.8	843	40.0	37.0	40.2
Unknown	3	25.0	24.6	340	16.1	27.3	0.0
Total	12	100.0	100.0	2,110	100.0	100.0	100.0
Source: 2024 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Small Business Loans

The distribution of small business loans reflects adequate penetration among businesses of different revenue sizes. In 2024, Guaranty Bank originated 53.7 percent of its small business loans to businesses with gross annual revenues of \$1 million or less, which is above the aggregate at 52.3 percent, but significantly below the percentage of small businesses in the assessment area at 91.4 percent. Of loans to businesses with revenues of \$1 million or less, 69.0 percent were in amounts of \$100,000 or less. Loans in these amounts are generally considered most beneficial for small

businesses, demonstrating the bank’s ability to meet the credit needs of small businesses.

The following table presents the bank’s borrower distribution of small business loans in 2024.

Distribution of 2024 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Joplin, MO-KS MSA 27900							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	29	53.7	52.3	3,433	39.3	41.1	91.4
Over \$1 Million	22	40.7		5,187	59.4		7.4
Revenue Unknown	3	5.6		105	1.2		1.2
Total	54	100.0		8,725	100.0		100.0
By Loan Size							
\$100,000 or Less	30	55.6	91.6	1,539	17.6	32.9	
\$100,001 - \$250,000	14	25.9	4.4	2,318	26.6	17.3	
\$250,001 - \$1 Million	10	18.5	4.1	4,868	55.8	49.8	
Total	54	100.0	100.0	8,725	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	20	69.0		893	26.0		
\$100,001 - \$250,000	5	17.2		821	23.9		
\$250,001 - \$1 Million	4	13.8		1,719	50.1		
Total	29	100.0		3,433	100.0		
Source: 2024 FFIEC Census Data 2024 Dori & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Community Development Lending

Guaranty Bank makes a relatively high level of community development loans and makes limited use of innovative and/or flexible lending practices in serving assessment area credit needs. During the evaluation period, the bank originated four qualified community development loans totaling approximately \$16.8 million, which was a decrease from the previous examination where the bank originated seven qualified community development loans for approximately \$23.1 million. When adjusting for variance in review period length, the bank’s current performance in community development lending decreased 30.7 percent by number and 12.0 percent by dollar volume when compared to the previous evaluation. The qualified loans addressed economic development and revitalization/stabilization efforts within the assessment area. As noted previously, COVID-19

pandemic related support impacted opportunities nationwide. Further, during the current performance evaluation, the bank identified some of the challenges within the assessment area, including a limited number of lending opportunities that met community development criteria and competition for each of those opportunities.

The following table presents the bank's community development loans throughout its assessment area during the review period.

Community Development Loans May 2, 2023, through January 20, 2026										
Area	Affordable Housing		Community Services		Economic Development		Revitalize/ Stabilize		Total	
	#	(\$000s)	#	(\$000s)	#	(\$000s)	#	(\$000s)	#	(\$000s)
Assessment Area	0	0	0	0	1	69	3	16,712	4	16,781

INVESTMENT TEST

Guaranty Bank made an adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors, rarely in a leadership position. The bank makes occasional use of innovative and/or complex investments to support community initiatives and demonstrates good responsiveness to credit and community development needs.

During the evaluation period, the bank made one community development investment totaling \$600,000 within the assessment area, which is an increase from the previous assessment where the bank made no qualified investments. The investment was made within the current review period and targeted community services assisting low- or moderate-income individuals or geographies. The investment was made to fund improvements within a school district in which 62.3 percent of students are on a free or reduced lunch program.

Community Development Investments May 2, 2023, through January 20, 2026											
Assessment Area		Affordable Housing		Community Services		Economic Development		Revitalize/ Stabilize		Total	
		#	\$	#	\$	#	\$	#	\$	#	\$
Assessment Area	Current	0	0	1	600,000	0	0	0	0	1	600,000
	Prior	0	0	0	0	0	0	0	0	0	0
	Total	0	0	1	600,000	0	0	0	0	1	600,000

Note: Dollar amounts are rounded and not reflective of exact figures.

Additionally, Guaranty Bank made 50 donations totaling \$68,250 to organizations within the assessment area during the evaluation period. Donations were made to a variety of organizations, with the majority of donations, by dollar volume, going towards community service efforts targeting low- and moderate-income individuals and communities (72.4 percent) as well as efforts

to revitalization/stabilization efforts within the assessment area (16.1 percent). During the previous evaluation the bank made 29 community development donations totaling \$32,145. When adjusting for variance in review period length, the bank's current performance in community development donations increased 109.0 percent by number and 157.4 percent by dollar volume.

SERVICE TEST

Guaranty Bank's retail delivery services are accessible to geographies and individuals of different income levels in its assessment area. To the extent changes have been made, its record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income individuals. The bank's services (including, where appropriate, business hours) do not vary in a way that inconveniences its assessment area, particularly low- or moderate-income geographies or low- or moderate-income individuals. The bank provides a relatively high level of community development services in the assessment area.

Retail Services

Guaranty Bank's retail delivery services are accessible to geographies and individuals of different income levels in its assessment area. The bank operates five branch offices, each with a full-service ATM in the assessment area. One branch office and ATM are located in a moderate-income census tract, while the remaining four branches and ATMs are located in middle- or upper-income census tracts. To the extent changes have been made, its record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income individuals. The bank has not opened or closed any branch offices within the assessment area since the previous evaluation.

Its services do not vary in a way that inconveniences its assessment area, particularly low- or moderate-income geographies or low- or moderate-income individuals. Offices in the assessment area have standard hours of 9:00 a.m. to 5:00 p.m., Monday through Friday, and certain offices, including the location in the moderate-income census tract, have extended hours generally from 9:00 a.m. to 12:00 p.m. on Saturdays, with extended drive-up hours every day that the branch is open.

As noted in the table below, the percentage of branches in moderate-income census tracts exceeds the percentage of census tracts or families within moderate-income tracts.

Distribution of Branches and Full-Service ATMs					
Tract Income Level	# of Branches	% of Total Branches	Census Tracts	% of Total Census Tracts	% of Families by Tract Income
Low	0	0.0	0	0.0	0.0
Moderate	1	20.0	4	16.7	15.6
Middle	3	60.0	28	66.7	65.7
Upper	1	20.0	7	16.7	18.7
Unknown	0	0.0	0	0.0	0.0
Total	5	100.0	42	100.0	100.0

Community Development Services

Guaranty Bank provides a provides a relatively high level of community development services. During the review period the bank provided 369 community development service hours. As illustrated in the following table, community development services were conducted in partnership with a variety of organizations; however, the majority of community development services hours had a focus of community services targeting low- or moderate-income individuals or geographies. Bank employees and management not only worked with these organizations but were, in many cases, serving in leadership roles on the organizations’ boards or leadership committees. During the previous evaluation the bank conducted 189 community development service hours. When adjusting for variance in review period length, the bank’s current performance in community development service hours increased 136.3 percent when compared to the previous evaluation.

The following table presents the bank’s community development services throughout its assessment area during the review period.

Community Development Services May 2, 2023, through January 20, 2026					
Area	Affordable Housing	Community Services	Economic Development	Revitalize/ Stabilize	Total
	Hours	Hours	Hours	Hours	Hours
Assessment Area	17	215	90	47	369

APPENDIX A – Additional Demographics and Lending Tables

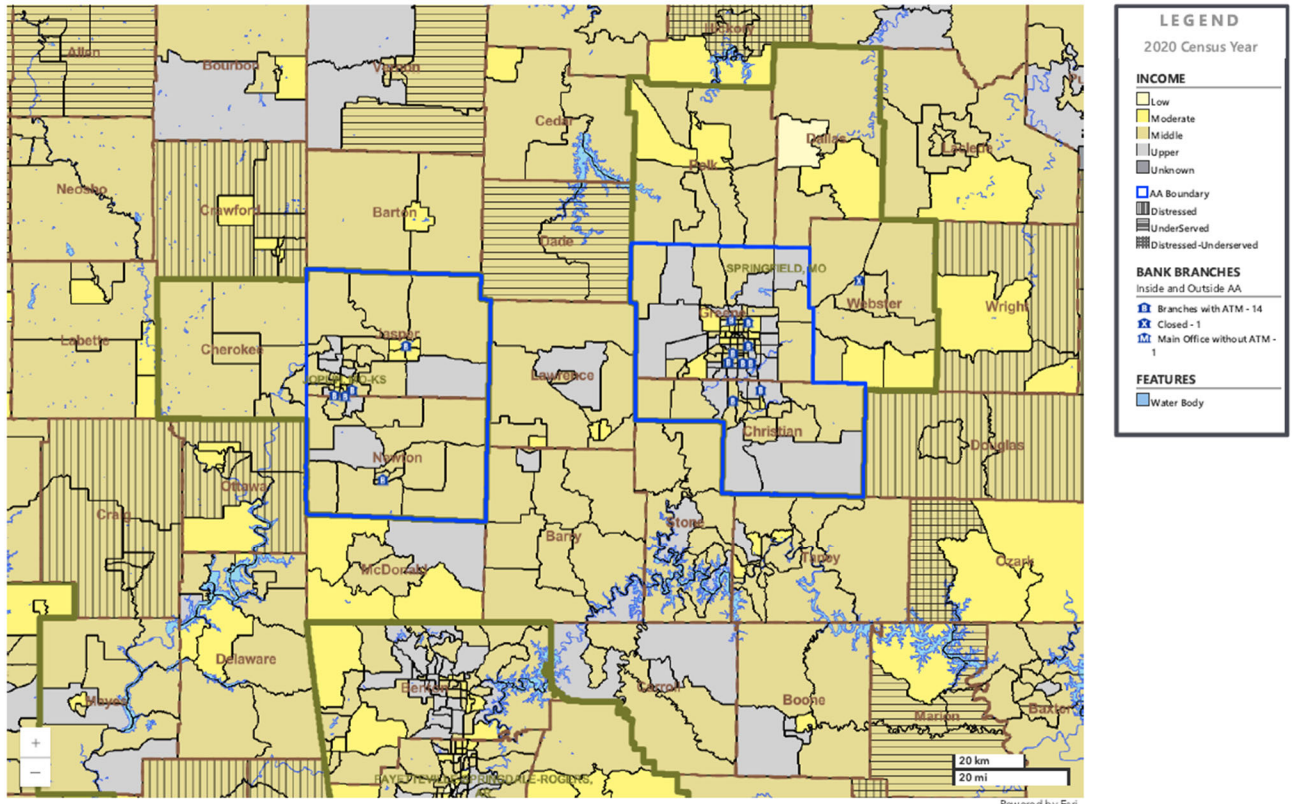
2023 Springfield, MO MSA 44180 AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	5	5.2	2,672	2.7	690	25.8	17,975	18.4
Moderate	21	21.6	16,291	16.7	3,052	18.7	17,895	18.3
Middle	40	41.2	44,302	45.3	3,433	7.7	21,174	21.7
Upper	29	29.9	34,381	35.2	1,135	3.3	40,738	41.7
Unknown	2	2.1	136	0.1	35	25.7	0	0.0
Total AA	97	100.0	97,782	100.0	8,345	8.5	97,782	100.0
Housing Units by Tract	Housing Type by Tract							
	Owner-occupied				Rental		Vacant	
	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	8,251	1,544	1.6	18.7	5,955	72.2	752	9.1
Moderate	34,187	12,799	13.3	37.4	18,880	55.2	2,508	7.3
Middle	76,099	44,063	45.9	57.9	28,098	36.9	3,938	5.2
Upper	49,279	37,585	39.1	76.3	9,795	19.9	1,899	3.9
Unknown	1,425	27	0.0	1.9	1,273	89.3	125	8.8
Total AA	169,241	96,018	100.0	56.7	64,001	37.8	9,222	5.4
Total Businesses by Tract	Businesses by Tract & Revenue Size							
	Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
	#	%	#	%	#	%	#	%
Low	337	2.0	307	2.0	29	2.2	1	0.8
Moderate	3,787	22.4	3,251	21.0	520	39.2	16	13.6
Middle	7,658	45.3	7,101	45.9	493	37.1	64	54.2
Upper	4,735	28.0	4,449	28.8	250	18.8	36	30.5
Unknown	383	2.3	346	2.2	36	2.7	1	0.8
Total AA	16,900	100.0	15,454	100.0	1,328	100.0	118	100.0
Percentage of Total Businesses:			91.4		7.9		0.7	
Total Farms by Tract	Farms by Tract & Revenue Size							
	Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
	#	%	#	%	#	%	#	%
Low	1	0.4	1	0.4	0	0.0	0	0.0
Moderate	21	7.7	20	7.4	1	50.0	0	0.0
Middle	145	53.1	144	53.1	1	50.0	0	0.0
Upper	103	37.7	103	38.0	0	0.0	0	0.0
Unknown	3	1.1	3	1.1	0	0.0	0	0.0
Total AA	273	100.0	271	100.0	2	100.0	0	0.0
Percentage of Total Farms:			99.3		0.7		0.0	
<i>Source: 2023 FFIEC Census Data 2023 Data & Business Data 2016-2020 U.S. Census Bureau: American Community Survey</i>								
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

2023 Joplin, MO MSA 27900 AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	8,566	18.9
Moderate	7	16.7	7,083	15.6	1,789	25.3	8,918	19.7
Middle	29	69.0	30,896	68.1	2,818	9.1	9,822	21.7
Upper	6	14.3	7,383	16.3	531	7.2	18,056	39.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	42	100.0	45,362	100.0	5,138	11.3	45,362	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	14,217	5,812	12.8	40.9	6,680	47.0	1,725	12.1
Middle	50,457	31,546	69.2	62.5	13,841	27.4	5,070	10.0
Upper	11,899	8,198	18.0	68.9	2,507	21.1	1,194	10.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	76,573	45,556	100.0	59.5	23,028	30.1	7,989	10.4
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	1,302	20.9	1,155	20.3	135	28.1	12	16.9
Middle	4,034	64.7	3,698	65.0	284	59.2	52	73.2
Upper	901	14.4	833	14.7	61	12.7	7	9.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	6,237	100.0	5,686	100.0	480	100.0	71	100.0
Percentage of Total Businesses:			91.2		7.7		1.1	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	5	2.4	5	2.4	0	0.0	0	0.0
Middle	172	83.1	170	82.9	2	100.0	0	0.0
Upper	30	14.5	30	14.6	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	207	100.0	205	100.0	2	100.0	0	0.0
Percentage of Total Farms:			99.0		1.0		0.0	
<i>Source: 2023 FFIEC Census Data 2023 Data & Business Data 2016-2020 U.S. Census Bureau: American Community Survey</i>								
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

Distribution of 2023 Home Mortgage Lending By Income Level of Geography Assessment Area: Joplin, MO MSA 27900							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	14.3	17.0	390	12.0	13.1	12.8
Middle	10	71.4	67.7	2,379	73.0	68.4	69.2
Upper	2	14.3	15.3	488	15.0	18.4	18.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	14	100.0	100.0	3,257	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	15.0	0	0.0	11.1	12.8
Middle	4	57.1	66.8	176	24.5	70.0	69.2
Upper	3	42.9	18.2	543	75.5	18.9	18.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	7	100.0	100.0	719	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	100.0	15.1	230	100.0	16.9	12.8
Middle	0	0.0	70.2	0	0.0	64.9	69.2
Upper	0	0.0	14.8	0	0.0	18.2	18.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	230	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	30.2	0	0.0	19.8	32.8
Middle	0	0.0	55.8	0	0.0	74.4	60.4
Upper	0	0.0	14.0	0	0.0	5.8	6.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	3	13.6	16.4	620	14.7	13.3	12.8
Middle	14	63.6	67.6	2,555	60.7	68.8	69.2
Upper	5	22.7	16.0	1,031	24.5	18.0	18.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	22	100.0	100.0	4,206	100.0	100.0	100.0
Source: 2023 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2023 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Joplin, MO MSA 27900							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$ (000)	%	%	
Home Purchase Loans							
Low	1	7.1	5.7	98	3.0	3.2	18.9
Moderate	2	14.3	19.5	254	7.8	14.7	19.7
Middle	1	7.1	21.8	330	10.1	20.5	21.7
Upper	6	42.9	26.7	1,225	37.6	36.1	39.8
Unknown	4	28.6	26.2	1,350	41.4	25.6	0.0
Total	14	100.0	100.0	3,257	100.0	100.0	100.0
Refinance Loans							
Low	1	14.3	8.3	50	7.0	4.0	18.9
Moderate	4	57.1	17.7	213	29.6	12.4	19.7
Middle	0	0.0	23.1	0	0.0	22.2	21.7
Upper	2	28.6	31.9	456	63.4	40.2	39.8
Unknown	0	0.0	18.9	0	0.0	21.1	0.0
Total	7	100.0	100.0	719	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	8.2	0	0.0	4.1	18.9
Moderate	0	0.0	16.1	0	0.0	12.8	19.7
Middle	0	0.0	21.3	0	0.0	17.2	21.7
Upper	0	0.0	44.9	0	0.0	53.2	39.8
Unknown	1	100.0	9.5	230	100.0	12.7	0.0
Total	1	100.0	100.0	230	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	2	9.1	6.5	148	3.5	3.4	18.9
Moderate	6	27.3	19.1	467	11.1	14.3	19.7
Middle	1	4.5	22.0	330	7.8	20.7	21.7
Upper	8	36.4	29.8	1,681	40.0	37.5	39.8
Unknown	5	22.7	22.7	1,580	37.6	24.1	0.0
Total	22	100.0	100.0	4,206	100.0	100.0	100.0
Source: 2023 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

APPENDIX B – Maps of Assessment Areas



APPENDIX C – Scope of Examination

SCOPE OF EXAMINATION			
TIME PERIOD REVIEWED	<u>Retail Lending</u> HMDA-reportable lending: January 1, 2023, to December 31, 2024 CRA-reportable small business lending: January 1, 2024, to December 31, 2024 <u>Community Development Activities</u> Community Development activity: May 2, 2023, through January 20, 2026		
FINANCIAL INSTITUTION			PRODUCTS REVIEWED
Guaranty Bank			<ul style="list-style-type: none"> • HMDA-reportable loans • CRA-reportable small business loans • Community Development loans, investments, and services
AFFILIATE(S)	AFFILIATE RELATIONSHIP		PRODUCTS REVIEWED
None	N/A		N/A
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
1. Springfield, MO MSA #44180	Full scope review	None	None
2. Joplin, MO-KS MSA #27900	Full scope review	None	None

APPENDIX D – Glossary

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

Affordability ratio: To determine housing affordability, the affordability ratio is calculated by dividing median household income by median housing value. This ratio allows the comparison of housing affordability across assessment areas and/or communities. An area with a high ratio generally has more affordable housing than an area with a low ratio.

Aggregate lending: The number of loans originated and purchased by all lenders subject to reporting requirements as a percentage of the aggregate number of loans originated and purchased by all lenders in the MSA/assessment area.

American Community Survey Data (ACS): The American Community Survey (ACS) data is based on a nationwide survey designed to provide local communities with reliable and timely demographic, social, economic, and housing data each year. The Census Bureau first released data for geographies of all sizes in 2010. This data is known as the “five-year estimate data.” The five-year estimate data is used by the FFIEC as the base file for data used in conjunction with consumer compliance and CRA examinations.²

Area Median Income (AMI): AMI means –

1. The median family income for the MSA, if a person or geography is located in an MSA, or for the metropolitan division, if a person or geography is located in an MSA that has been subdivided into metropolitan divisions; or
2. The statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

Assessment area: Assessment area means a geographic area delineated in accordance with section 228.41

Automated teller machine (ATM): An automated teller machine means an automated, unstaffed banking facility owned or operated by, or operated exclusively for, the bank at which deposits are received, cash dispersed or money lent.

Bank: Bank means a state member as that term is defined in section 3(d)(2) of the Federal Deposit Insurance Act (12 USC 1813(d)(2)), except as provided in section 228.11(c)(3), and includes an

² Source: FFIEC press release dated October 19, 2011.

uninsured state branch (other than a limited branch) of a foreign bank described in section 228.11(c)(2).

Branch: Branch refers to a staffed banking facility approved as a branch, whether shared or unshared, including, for example, a mini-branch in a grocery store or a branch operated in conjunction with any other local business or nonprofit organization.

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

Combined Statistical Area (CSAs): Adjacent metropolitan statistical areas/metropolitan divisions (MSA/MDs) and micropolitan statistical areas may be combined into larger Combined Statistical Areas based on social and economic ties as well as commuting patterns. The ties used as the basis for CSAs are not as strong as the ties used to support MSA/MD and micropolitan statistical area designations; however, they do bind the larger area together and may be particularly useful for regional planning authorities and the private sector. Under Regulation BB, assessment areas may be presented under a Combined Statistical Area heading; however, all analysis is conducted on the basis of median income figures for MSA/MDs and the applicable state-wide non metropolitan median income figure.

Community Development: The financial supervisory agencies have adopted the following definition for community development:

1. Affordable housing, including for multi-family housing, for low- and moderate-income households;
2. Community services tailored to meet the needs of low- and moderate-income individuals;
3. Activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or
4. Activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definitions of community development. Activities that revitalize or stabilize:

- 1) Low- or moderate-income geographies;
- 2) Designated disaster areas; or
- 3) Distressed or underserved nonmetropolitan middle-income geographies

designated by the Board, Federal Deposit Insurance Corporation and Office of the Comptroller of the Currency based on:

- a. Rates of poverty, unemployment or population loss; or
- b. Population size, density and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density and dispersion if they help to meet essential community services including the needs of low- and moderate-income individuals.

Community Development Loan: A community development loan means a loan that:

- 1) Has as its primary purpose community development; and
- 2) Except in the case of a wholesale or limited purpose bank –
 - a. Has not been reported or collected by the bank or an affiliate for consideration in the bank’s assessment as a home mortgage, small business, small farm, or consumer loan, unless it is a multi-family housing loan (as described in the regulation implementing the Home Mortgage Disclosure Act); and
 - b. Benefits the bank’s assessment area(s) or a broader statewide or regional area that includes the bank’s assessment area(s).

Community Development Service: A community development service means a service that:

- 1) Has as its primary purpose community development; and
- 2) Is related to the provision of financial services.

Consumer loan: 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 of loans: motor vehicle, credit card, other consumer secured loan, includes loans for home improvement purposes not secured by a dwelling, and other consumer unsecured loan, includes loans for home improvement purposes not secured.

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).

Fair market rent: Fair market rents (FMRs) are gross rent estimates. They include the shelter rent plus the cost of all tenant-paid utilities, except telephones, cable or satellite television service, and internet service. HUD sets FMRs to assure that a sufficient supply of rental housing is available to their program participants. To accomplish this objective, FMRs must be both high enough to

permit a selection of units and neighborhoods and low enough to serve as many low-income families as possible. The level at which FMRs are set is expressed as a percentile point within the rent distribution of standard-quality rental housing units. The current definition used is the 40th percentile rent, the dollar amount below which 40 percent of the standard-quality rental housing units are rented. The 40th percentile rent is drawn from the distribution of rents of all units occupied by recent movers (renter households who moved to their present residence within the past 15 months). HUD is required to ensure that FMRs exclude non-market rental housing in their computation. Therefore, HUD excludes all units falling below a specified rent level determined from public housing rents in HUD's program databases as likely to be either assisted housing or otherwise at a below-market rent, and units less than two years old.

Full review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and amount of qualified investments) and qualitative factors (for example, innovativeness, complexity and responsiveness).

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

Home Mortgage Disclosure Act: The statute that requires certain mortgage lenders that do business or have banking offices in metropolitan statistical areas to file annual summary reports of their mortgage lending activity. The reports include data such as the race, gender and income of the applicant(s) and the disposition of the application(s) (for example, approved, denied, and withdrawn).

Home mortgage loans: Are defined in conformance with the definitions of home mortgage activity under the Home Mortgage Disclosure Act and include closed end mortgage loans secured by a dwelling and open-end lines of credit secured by a dwelling. This includes loans for home purchase, refinancing and loans for multi-family housing. It does not include loans for home improvement purposes that are not secured by a dwelling.

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.

Income Level: Income level means:

- 1) Low-income – an individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent in the case of a census tract;
- 2) Moderate-income – an 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 census tract;

- 3) Middle-income – an 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 census tract; and
- 4) Upper-income – an 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 census tract.

Additional Guidance: .12(m) Income Level: The median family income levels (MFI) for census tracts are calculated using the income data from the United States Census Bureau's American Community Survey and geographic definitions from the Office of Management and Budget (OMB) and are updated approximately every five years (.12(m) Income Level).

Limited-purpose bank: This term refers to a bank that offers only a narrow product line such as credit card or motor vehicle loans to a regional or broader market and for which a designation as a limited-purpose bank is in effect, in accordance with section 228.25(b).

Limited review: Performance under the Lending, Investment and Services test is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, amount of investments and branch office distribution).

Loan location: Under this definition, a loan is located as follows:

- 1) Consumer loan is located in the census tract where the borrower resides;
- 2) Home mortgage loan is located in the census tract where the property to which the loan relates is located;
- 3) Small business and small farm loan is located in the census tract where the main business facility or farm is located or where the loan proceeds have been applied as indicated by the borrower.

Loan production office (LPO): This term refers to a staffed facility, other than a branch, that is open to the public and that provides lending-related services, such as loan information and applications.

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

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

Metropolitan Area: A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a single core population of at least 2.5 million may be divided into MDs. A metropolitan statistical area that crosses into two or more bordering states is called a multistate metropolitan statistical area.

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

Nonmetropolitan area: This term refers to any area that is not located in a metropolitan statistical area or metropolitan division. Micropolitan statistical areas are included in the definition of a nonmetropolitan area; a micropolitan statistical area has an urban core population of at least 10,000 but less than 50,000.

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: This term refers to any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated area: This term refers to a state or multistate metropolitan area. For institutions with domestic branch offices in one state only, the institution's CRA rating is the state's rating. If the institution maintains domestic branch offices in more than one state, the institution will receive a rating for each state in which those branch offices are located. If the institution maintains domestic branch offices in at least two states in a multistate metropolitan statistical area, the institution will receive a rating for the multistate metropolitan area.

Small Bank: This term refers to a bank that as of December 31 of either of the prior two calendar years, had assets of less than \$1.252 billion. Intermediate small bank means a small bank with assets of at least \$313 million as of December 31 of both of the prior two calendar years and less than \$1.252 billion as of December 31 of either of the prior two calendar years.

Annual Adjustment: The dollar figures in paragraph (u)(1) of this section shall be adjusted annually and published by the Board, based on the year-to-year change in the average of the Consumer Price Index for Urban Wage Earners and Clerical Workers, not seasonally adjusted, for each 12-month period ending in November, with rounding to the nearest million.

Small Business Loan: This term refers to a loan that is included in "loans to small businesses" as defined in the instructions for preparation of the Consolidated Report of Condition and Income. The loans have original amounts of \$1 million or less and are either secured nonfarm, nonresidential properties or are classified as commercial and industrial loans.

Small Farm Loan: This term refers to a loan that is included in “loans to small farms” as defined in the instructions for preparation of the Consolidated Report of Condition and Income. These loans have original amounts of \$500 thousand or less and are either secured by farmland, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

Wholesale Bank: This term refers to a bank that is not in the business of extending home mortgage, small business, small farm or consumer loans to retail customers, and for which a designation as a wholesale bank is in effect, in accordance with section 228.25(b).