

PUBLIC DISCLOSURE

June 13, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**OakStar Bank
RSSD #3374412**

**1020 East Battlefield Road
Springfield, MO 65807**

Federal Reserve Bank of St. Louis

**P.O. Box 442
St. Louis, Missouri 63166-0442**

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

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INSTITUTION'S CRA RATING: This institution is rated SATISFACTORY.

The Lending Test is rated:

Satisfactory

The Community Development Test is rated:

Outstanding

OakStar Bank meets the criteria for a Satisfactory rating based on the evaluation of the bank's lending and community development activities. The factors supporting the institution's rating include:

- The loan-to-deposit (LTD) ratio is more than reasonable given the institution's size, financial condition, and credit needs of the assessment areas.
- A majority of loans and other lending-related activities are in the assessment areas.
- Distribution of loans to borrowers reflects reasonable penetration among individuals of different income levels (including low- and moderate-income [LMI]) and businesses of different revenue sizes.
- Geographic distribution of loans reflects a reasonable dispersion throughout the assessment areas.
- There were no CRA-related complaints filed against the bank since the previous CRA evaluation.
- The bank's overall community development performance demonstrates excellent responsiveness to the community development needs of its assessment areas, considering the bank's capacity and the need and availability of such opportunities for community development in the assessment areas. The bank has responded to these needs through community development loans, qualified investments, and community development services.

During the COVID-19 pandemic, the bank responded to the needs of the community through its participation in the CARES Act¹ Paycheck Protection Program (PPP). The bank's participation in the PPP was also considered in the bank's rating.

SCOPE OF EXAMINATION

The bank's CRA performance was reviewed using the Federal Financial Institutions Examination Council's (FFIEC's) intermediate small bank procedures. The intermediate small bank examination procedures entail two performance tests: the Lending Test and the Community Development Test. Bank performance under these tests is rated at the institution level, as well as by state levels. The bank maintains operations in five delineated assessment areas within two states, Missouri and Kansas. In light of these characteristics, the bank received three sets of ratings: overall institution ratings, ratings for the state of Missouri, and ratings for the state of Kansas.

¹ Coronavirus Aid, Relief, and Economic Security Act, signed into law on March 27, 2020.

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The following table details the number of branch offices, breakdown of deposits, and the CRA review procedures applicable to each rated area completed as part of this evaluation. Deposit information in the following table, as well as deposit information throughout this evaluation, is taken from the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report data as of June 30, 2021.

State	Offices		Deposits as of June 30, 2021		Assessment Area Reviews		
	#	%	\$ (000s)	%	Full Scope	Limited Scope	TOTAL
Missouri	15	88.2%	\$1,491,146	98.5%	1	2	3
Kansas	2	11.8%	\$23,097	1.5%	1	1	2
OVERALL	17	100%	\$1,514,243	100%	2	3	5

In light of branch structure, loan and deposit activity, and the bank's CRA evaluation history, CRA performance in the state of Missouri was given primary consideration, as it contains the majority of the bank's loan and deposit activity.

Furthermore, residential real estate and small business loans were used to evaluate the bank's lending performance, as these loan categories are considered the bank's core business lines based on lending volume and the bank's stated business strategy. Therefore, the loan activity represented by these credit products is deemed indicative of overall lending performance. However, as the bank has a particular emphasis on home mortgage lending, performance based on the Home Mortgage Disclosure Act (HMDA) loan category carried the most significance toward the bank's overall performance conclusions. The following table details the performance criterion and the corresponding time periods used in each analysis.

Performance Criterion	Time Period
LTD Ratio	September 30, 2018 – March 31, 2022
Assessment Area Concentration	January 1, 2020 – December 31, 2020
Geographic Distribution of Loans	
Loan Distribution by Borrower's Profile	
Response to Written CRA Complaints	August 20, 2018 – June 12, 2022
Community Development Activities	August 20, 2018 – June 12, 2022

Lending Test analyses often entail comparisons of bank performance to assessment area demographics and the performance of other lenders, based on HMDA and CRA aggregate lending data. Unless otherwise noted, assessment area demographics are based on 2015 American Community Survey (ACS) data; certain business demographics are based on 2020 Dun & Bradstreet data. When analyzing bank performance by comparing lending activity to both demographic data and aggregate lending data, greater emphasis is generally placed on the aggregate lending data, because it is expected to describe many factors impacting lenders within an assessment area. Aggregate lending datasets are also updated annually and are, therefore,

expected to predict more relevant comparisons. In addition, the bank's lending levels were evaluated in relation to those of comparable financial institutions operating within the same general region. Three other banks were identified as similarly situated peers, with asset sizes ranging from \$1.2 billion to \$2.9 billion as of March 31, 2022.

As part of the Community Development Test, the bank's performance was evaluated using the following criteria, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment areas.

- The number and dollar amount of community development loans.
- The number and dollar amount of qualified investments and grants.
- The extent to which the bank provides community development services.

The review included community development activities initiated from the date of the bank's previous CRA evaluation to this review date. In addition, investments made prior to the date of the previous CRA evaluation, but still outstanding as of this review date, were also considered.

To augment this evaluation, three community contact interviews with members of the local community were utilized to ascertain specific credit needs, opportunities, and local market conditions within the assessment areas. Information from these interviews also assisted in evaluating the bank's responsiveness to identified community credit needs and community development opportunities. Key details from these community contact interviews are included in the *Description of Assessment Area* section, applicable to the assessment area in which they were conducted.

DESCRIPTION OF INSTITUTION

OakStar Bank is a full-service retail bank offering both consumer and commercial loan and deposit products. The bank is wholly owned by OakStar Bancshares, Inc., a three-bank holding company; the bank and its holding company are both headquartered in Springfield, Missouri. The bank's branch network consists of 17 offices (including the main office), 13 of which have full-service automated teller machines (ATMs) onsite. In addition to being a full-service facility, the main office and 13 branches also have drive-up accessibility. The bank operates two stand-alone ATMs that are cash dispensing only. Moreover, the bank opened four branch offices and five loan production offices (LPOs) during this review period. Based on this branch network and other service delivery systems, such as online banking capabilities, the bank is well positioned to deliver financial services to the majority of its assessment areas.

The bank currently operates in five CRA assessment areas as detailed below:

Missouri

- Springfield assessment area – all of Christian, Dallas, Greene, and Polk Counties, Missouri (four of the five counties comprising the Springfield, Missouri Metropolitan Statistical Area [MSA]).

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- Joplin, Missouri MSA assessment area – all of Jasper and Newton Counties, Missouri (comprising the entirety of the MSA).
- Western Missouri assessment area – all of Camden, Hickory, Henry, and Benton Counties, Missouri.

Kansas

- Kansas City assessment area – all of Jackson County, Missouri; Johnson and Wyandotte Counties, Kansas (three of the six counties comprising the Kansas City, Missouri-Kansas MSA).
- Franklin County assessment area – all of Franklin County, Kansas.

OakStar Bank opened a branch in Ottawa, Kansas (Franklin County), in November 2021, leading to the addition of nonMSA Kansas assessment area in January 2022. Due to the opening date's proximity to the start of the examination, a review of the bank's performance using the applicable intermediate small bank procedures is not possible. Therefore, the bank's ratings in the state of Kansas only reflect the bank's performance in Kansas City assessment area.

For this review period, no legal impediments or financial constraints were identified that would have hindered the bank from serving the credit needs of its customers, and the bank appeared capable of meeting the credit needs of its assessment areas based on its available resources and financial products. As of March 31, 2022, the bank reported total assets of \$1.9 billion. As of the same date, loans and leases outstanding were \$1.4 billion (72.3 percent of total assets), and deposits totaled \$1.7 billion. The bank's loan portfolio composition by credit category is displayed in the following table.

Distribution of Total Loans as of March 31, 2022		
Credit Category	Amount (\$000s)	Percentage of Total Loans
Construction and Development	\$163,694	11.9%
Commercial Real Estate	\$419,766	30.6%
Multifamily Residential	\$88,573	6.5%
1–4 Family Residential	\$305,729	22.3%
Farmland	\$123,682	9.0%
Farm Loans	\$23,937	1.7%
Commercial and Industrial	\$181,527	13.2%
Loans to Individuals	\$38,746	2.8%
Total Other Loans	\$24,502	1.8%
TOTAL	\$1,370,156	100%

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As indicated by the table above, a significant portion of the bank's lending resources is directed to commercial real estate loans, loans secured by 1-4 family residential properties, and commercial and industrial loans. The bank also originates and subsequently sells a significant volume of loans related to residential real estate. As these loans are sold on the secondary market shortly after origination, this activity would not be captured in the table.

The bank received a Satisfactory rating at its previous CRA evaluation conducted by this Reserve Bank on August 20, 2018.

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Rated Area	Lending Test Rating
Missouri	Satisfactory
Kansas	Satisfactory
OVERALL	Satisfactory

OakStar Bank meets the standards for a satisfactory Lending Test rating under the intermediate small bank procedures, which evaluate bank performance under the following five criteria as applicable.

Loan-to-Deposit (LTD) Ratio

One indication of the bank's overall level of lending activity is its LTD ratio. The table below displays the bank's average LTD ratio in comparison to those of regional peers. The average LTD ratio represents a 15-quarter average, dating back to the bank's last CRA evaluation.

LTD Ratio Analysis			
Name	Headquarters	Asset Size (\$000s) as of March 31, 2022	Average LTD Ratio
OakStar Bank	Springfield, Missouri	\$1,895,004	90.1%
Regional Banks	Springfield, Missouri	\$1,222,860	85.9%
	Perryville, Missouri	\$2,878,876	81.9%
	Topeka, Kansas	\$1,201,282	84.9%

Based on data from the previous table, the bank's level of lending is above those of other banks in the region. During the review period, the bank's quarterly LTD ratio experienced a 15-quarter average of 90.1 percent, following a generally decreasing trend from second quarter 2020. In comparison, the average LTD ratios for the regional peers were lower and also decreased over the course of the review period. Therefore, compared to data from regional banks, the bank's average LTD ratio is more than reasonable given the bank's size, financial condition, and credit needs of its assessment areas.

Assessment Area Concentration

For the loan activity reviewed as part of this evaluation, the following table displays the number and dollar volume of loans inside and outside the bank's assessment areas.

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Lending Inside and Outside of Assessment Areas						
January 1, 2020 through December 31, 2020						
Loan Type	Inside Assessment Areas		Outside Assessment Areas		TOTAL	
HMDA	1,999	80.9%	471	19.1%	2,470	100%
	519,229	78.4%	143,192	21.6%	\$662,421	100%
Small Business	1,891	82.3%	406	17.7%	2,297	100%
	179,083	77.5%	51,883	22.5%	\$230,966	100%
TOTAL LOANS	3,890	81.6%	877	18.4%	4,767	100%
	698,312	78.2%	195,075	21.8%	\$893,387	100%

A majority of loans and other lending-related activities were made in the bank's assessment areas. As shown above, 81.6 percent of the total loans were made inside the assessment areas, accounting for 78.2 percent of the dollar volume of total loans.

Geographic and Borrower Distribution

As displayed in the following table, the bank's overall performance by borrower's income/revenue profile is reasonable, based on the analyses of lending in the states of Missouri and Kansas, as is displayed in the following table.

Rated Area	Loan Distribution by Borrower's Profile
Missouri	Reasonable
Kansas	Reasonable
OVERALL	REASONABLE

Overall distribution of lending by income level of census tract reflects reasonable penetration throughout the bank's rated areas subject to review.

Rated Area	Geographic Distribution of Loans
Missouri	Reasonable
Kansas	Reasonable
OVERALL	REASONABLE

Responses to Complaints

No CRA-related complaints were filed against the bank during this review period (August 20, 2018 through June 12, 2022).

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COMMUNITY DEVELOPMENT TEST

OakStar Bank's performance under the Community Development Test is rated outstanding. The bank demonstrates excellent responsiveness to the community development needs of its Missouri and Kansas rated areas, considering the bank's capacity and the need and availability of such opportunities for community development in the assessment areas.

Rated Area	Community Development Test Rating
Missouri	Outstanding
Kansas	Outstanding
OVERALL	OUTSTANDING

During the review period, the bank made 164 qualifying community development loans in its assessment areas totaling approximately \$207.9 million. A significant portion of loan dollars were extended to finance affordable housing organizations or revitalize/stabilize LMI and distressed or underserved census tracts. The bank also originated loans funding small business start-ups and expansions under the economic development purpose, as well as loans to community service organizations.

The bank also made community development investments and donations in its assessment areas totaling \$4.6 million. This amount included 6 new qualified investments totaling \$4.3 million, 3 continuing investments made in a prior review period totaling \$275 thousand, and 264 donations totaling \$359 thousand. All of the investments were municipal bonds issued by school districts primarily serving students from LMI families, or mortgage-backed securities (MBS). The donations were made for a variety of community development purposes, including funds for LMI students in the assessment areas, for community service organizations targeting LMI families, and for revitalization and stabilization of distressed middle-income geographies.

During the review period, 94 bank employees used financial expertise to log 1,918 service hours to 53 different community development organizations within the bank's assessment areas. Service activities included delivering financial education in schools that primarily serve LMI families and providing financial expertise to community service organizations as board members.

Furthermore, the bank participated in community development activities outside of its assessment areas and benefiting the greater region. Regional loans totaled \$88.1 million (30 loans), regional investments \$905 thousand (6 investments), and services 69 hours (2 employees with 2 separate organizations).

COVID-19 PANDEMIC RESPONSE

In response to the COVID-19 pandemic, the bank originated 2,764 PPP loans, totaling \$163.9 million. These loans are administered by the Small Business Administration as part of the CARES Act.

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FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Based on findings from the Consumer Affairs examination, including a fair lending analysis performed under Regulation B – Equal Credit Opportunity and the Fair Housing Act requirements, conducted concurrently with this CRA evaluation, no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

Missouri

CRA RATING FOR Missouri:
Satisfactory
The Lending Test is rated:
Satisfactory
The Community Development Test is rated:
Outstanding

Major factors supporting the institution's Missouri rating include the following:

- The distribution of loans in the Missouri assessment areas reflects reasonable penetration among individuals of different income levels (including LMI levels) and businesses of different sizes.
- Overall, the geographic distribution of loans reflects reasonable dispersion throughout the Missouri assessment areas.
- The bank's community development performance demonstrates excellent responsiveness to community development needs through community development loans, qualified investments, and community development services, considering the need and availability for such opportunities for community development in the assessment areas.

SCOPE OF EXAMINATION

Scoping considerations applicable to the review of Missouri assessment areas are consistent with the overall CRA examination scope as presented in the *Institution* and *Scope of Examination* sections. The bank's ratings in the state of Missouri reflect a composite of the bank's performance in all three of its assessment areas throughout the state. The bank's three Missouri assessment areas are located in Springfield, Missouri; Joplin, Missouri; and nonMSA Missouri (the Western Missouri assessment area). The bank's CRA performance in its Springfield assessment area was evaluated using full-scope review procedures, while the Joplin, Missouri, and Western Missouri assessment areas were evaluated using limited-scope review procedures.

To augment the evaluation of the full-scope review assessment area in Missouri, two community contact interviews were utilized to ascertain specific community credit needs, community development opportunities, and local economic conditions. The interviews were conducted with representatives specializing in economic development. Details from these interviews are included in the *Description of Institution's Operations* section of the Springfield assessment area.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MISSOURI

OakStar operates 15 offices (88.2 percent of total branches) throughout the 3 CRA assessment areas in the state of Missouri. The following table gives additional detail regarding the bank's operations within Missouri.

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Assessment Area	Offices		Deposits as of June 30, 2021		Review Procedures
	#	%	\$	%	
Springfield	6	40.0%	\$1,036,776	69.5%	Full Scope
Western Missouri	8	53.3%	\$437,350	29.3%	Limited Scope
Joplin MSA	1	6.7%	\$17,020	1.1%	Limited Scope
TOTAL	15	100%	\$1,491,146	100%	1 – Full Scope

During the review period, the bank opened two branches in Missouri: one in the Springfield assessment area and one in the Joplin MSA assessment area.

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MISSOURI

LENDING TEST

OakStar Bank's Lending Test rating for the state of Missouri is satisfactory. The bank's overall distribution of loans by borrower's income and revenue profile reflects reasonable penetration among borrowers of different income levels and businesses of different sizes. Furthermore, the overall geographic distribution of loans reflects reasonable penetration throughout Missouri assessment areas.

Borrower and Geographic Distribution

Overall, the bank's performance by borrower's income and revenue profile is reasonable in Missouri, as displayed in the following tables.

Full-Scope Review Areas	Loan Distribution by Borrower's Profile
Springfield	Reasonable

Limited-Scope Review Areas	Loan Distribution by Borrower's Profile
Western Missouri	Consistent
Joplin MSA	Below

As displayed in the following tables, the bank's overall geographic distribution of loans reflects reasonable penetration throughout Missouri.

Full-Scope Review Areas	Geographic Distribution of Loans
Springfield	Reasonable

Limited-Scope Review Areas	Geographic Distribution of Loans
Western Missouri	Consistent
Joplin MSA	Consistent

COMMUNITY DEVELOPMENT TEST

OakStar Bank's Community Development Test rating in the state of Missouri is outstanding. The bank's overall community development performance demonstrates excellent responsiveness to the community development needs of Missouri assessment areas, considering the bank's capacity and the need/availability of such opportunities for community development. The bank has addressed the community development needs of its assessment areas through community development loans, qualified investments, and community development services.

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Full-Scope Review Areas	Community Development Performance
Springfield	Excellent

Limited-Scope Review Areas	Community Development Performance
Western Missouri	Consistent
Joplin MSA	Below

The bank extended 137 community development loans totaling \$175.3 million within Missouri assessment areas. The loans were primarily for revitalization and stabilization of LMI and distressed/underserved middle income geographies, and to fund affordable housing. In addition, the bank made \$4.1 million in new community development investments, retained three prior period investments totaling \$275 thousand, and offered 250 donations totaling \$337 thousand in its Missouri assessment areas. The majority of investment and donation dollars benefitted school districts that primarily serve students from LMI families and in MBS that finance affordable housing. Lastly, 91 bank employees provided 1,871 service hours to 51 community development organizations within Missouri assessment areas.

SPRINGFIELD, MISSOURI METROPOLITAN STATISTICAL AREA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE SPRINGFIELD ASSESSMENT AREA

Bank Structure

The bank operates six offices and an LPO in this assessment area representing 35.3 percent of total offices. There is one additional stand-alone, cash-only ATM in this assessment area. Of the six offices, one is located in a moderate-income census tract, and the remainder are located in middle-income census tracts. During this review period, the bank opened one branch in the assessment area (in Greene County) and one LPO (in Christian County). No offices were closed in this assessment area during the review period. Based on this branch network and other service delivery systems, the bank is adequately positioned to deliver financial services to the assessment area.

General Demographics

The assessment area is composed of Christian, Dallas, Greene, and Polk Counties, four of the five counties that make up the Springfield, Missouri MSA, located in the southwestern portion of the state. The bank maintains a branch presence in Polk, Dallas, and Greene Counties and operates an LPO in Christian County. Additionally, the bank's main office is located in Springfield. The assessment area is home to multiple universities, including Missouri State University, with more than 20,000 students in attendance. Per 2015 ACS data, the assessment area population was 411,781. Of the 34 FDIC-insured depository institutions with a branch presence in this assessment area, the bank ranked fourth in deposit market share, encompassing 7.4 percent of total deposit dollars.

Credit needs in the assessment area include a mix of consumer and business loan products, including home improvement loans and down payment assistance programs. Other particular needs, as noted by community contacts, include affordable housing and financial literacy initiatives. Additionally, one contact noted a lack of capital support for unbanked small business owners.

Income and Wealth Demographics

The following table summarizes the distribution of assessment area census tracts by income level and the family population in those tracts.

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Assessment Area Demographics by Geography Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown	TOTAL
Census Tracts	5	21	43	13	1	83
	6.0%	25.3%	51.8%	15.7%	1.2%	100%
Family Population	3,596	18,186	63,031	20,307	41	105,161
	3.4%	17.3%	59.9%	19.3%	0.0%	100%

As shown in the preceding table, 31.3 percent of the census tracts in the assessment area are LMI geographies, but only 20.7 percent of the family population resides in these tracts. The LMI areas are primarily concentrated in and around the city of Springfield and contain a significant amount of student housing.

Based on 2015 ACS data, the median family income for the assessment area was \$54,794. At the same time, the median family income for Missouri was \$60,809. More recently, the FFIEC estimates the 2020 median family income for the Springfield MSA to be \$64,800. The following table displays population percentages of assessment area families by income level compared to the Missouri family population.

Family Population by Income Level					
Dataset	Low-	Moderate-	Middle-	Upper-	TOTAL
Assessment Area	21,317	19,602	21,930	42,312	105,161
	20.3%	18.6%	20.9%	40.2%	100%
State of Missouri	327,271	274,380	319,267	609,088	1,530,006
	21.4%	17.9%	20.9%	39.8%	100%

As shown in the preceding table, 38.9 percent of families in the assessment area were considered LMI, which is similar to the LMI family percentage of 39.3 percent in Missouri. Additionally, the percentage of families living below the poverty level in the assessment area, 12.0 percent, is similar to the 11.1 percent level in the state of Missouri. Considering these factors, income levels in the assessment area are comparable to those in the state of Missouri as a whole.

Housing Demographics

Housing Demographics			
Dataset	Median Housing Value	Affordability Ratio	Median Gross Rent (monthly)
Assessment Area	\$130,457	32.9%	\$703
State of Missouri	\$138,400	34.8%	\$746

As displayed in the preceding table, housing affordability in the assessment area is comparable to the rest of Missouri. The median housing value for the assessment area was \$130,457, which is slightly below the figure for the state of Missouri, \$138,400. However, when taking income into account, housing in the assessment area appears to be slightly less affordable than in the state of Missouri as a whole; the assessment area housing affordability ratio of 32.9 percent is slightly below the state figure of 34.8 percent. Finally, the median gross rent for the assessment area (\$703) is less than that of the state of Missouri (\$746).

Industry and Employment Demographics

The assessment area supports a diverse business community, including a strong small business sector, as evidenced by Dun & Bradstreet data that indicates 91.1 percent of businesses in the assessment area have revenues less than or equal to \$1 million. County business patterns indicate that there are 172,496 paid employees in the assessment area. By percentage of employees, the three largest job categories in the assessment area are healthcare and social assistance (20.7 percent), followed by retail trade (14.2 percent), and accommodation and food services (10.5 percent). The table below details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area and the state of Missouri.

Unemployment Levels		
Time Period (Annual Average)	Assessment Area	State of Missouri
2021	3.4%	4.4%
2020	5.2%	6.1%
2019	2.7%	3.1%

As shown in the preceding table, unemployment levels for the assessment area, as well as the state of Missouri, increased in 2020, largely due to the COVID-19 pandemic. The unemployment rate has declined since reaching its peak in 2020. Additionally, unemployment levels in the assessment area are consistently lower compared to the state of Missouri as a whole.

Community Contact Information

For the Springfield assessment area, two community contact interviews were referenced as part of this evaluation. Both interviews were held with representatives from economic development organizations in the area. The community contact interviewees categorized the local economy as doing well overall. Although unemployment is low, one contact stated that the labor participation rate has been below the national average. The tight labor market is a barrier to businesses hoping to expand operations. The contact stated the population growth is only about 1 percent, as young professionals are moving to the area but working remotely. In addition, shortages in supplies and the rising cost of goods have negatively impacted small businesses in the area as they recover from the pandemic. Additionally, many small businesses lack access to capital, with some small business owners having low credit and no collateral. These issues present a need for mentorship, as well as personal and business finance classes.

One contact stated there is a need for banks to offer home improvement loans and down payment assistance to LMI individuals, as many of these individuals don't have sufficient collateral for a home improvement loan, or they lack the means to afford the upfront cost of home improvement loans or to save for a down payment. Additionally, the contact noted that the increasing cost of homes is limiting affordable housing availability.

Lastly, according to both contacts, there are many opportunities for banks to be involved in community development activities. One contact described the area as overbanked and described local banks as being invested in the community.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE SPRINGFIELD ASSESSMENT AREA**LENDING TEST**

The bank's overall distribution of loans by borrower's income/revenue profile reflects reasonable penetration among borrowers of different income levels and businesses of different revenue sizes. Furthermore, the overall geographic distribution of loans reflects reasonable penetration throughout the assessment area.

Loan Distribution by Borrower's Profile

Overall, the bank's loan distribution by borrower's profile is reasonable, based on performance from the two loan categories reviewed.

Borrowers are classified into low-, moderate-, middle-, and upper-income categories by comparing their reported income to the applicable median family income figure as estimated by the FFIEC (64,800 for the Springfield MSA as of 2020). The following table shows the distribution of HMDA-reported loans by borrower income level compared to family population income demographics for the assessment area. Additionally, aggregate data for the assessment area is displayed.

Borrower Distribution of Residential Real Estate Loans								
Assessment Area: Springfield								
Product Type	Borrower Income Levels	2020						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	46	7.5%	7.9%	4,587	4.0%	4.4%	20.3%
	Moderate	96	15.7%	21.0%	13,685	11.8%	16.3%	18.6%
	Middle	152	24.9%	21.3%	26,878	23.2%	20.5%	20.9%
	Upper	256	41.9%	30.6%	60,632	52.4%	40.5%	40.2%
	Unknown	61	10.0%	19.1%	9,888	8.5%	18.3%	0.0%
	TOTAL	611	100.0%	100.0%	115,670	100.0%	100.0%	100.0%
Refinance	Low	22	3.3%	4.9%	2,029	1.4%	2.4%	20.3%
	Moderate	85	12.7%	13.0%	11,377	8.1%	8.6%	18.6%
	Middle	144	21.6%	17.7%	24,718	17.5%	14.7%	20.9%
	Upper	361	54.1%	38.9%	90,897	64.4%	48.3%	40.2%
	Unknown	55	8.2%	25.5%	12,076	8.6%	26.0%	0.0%
	TOTAL	667	100.0%	100.0%	141,097	100.0%	100.0%	100.0%

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Home Improvement	Low	0	0.0%	7.1%	0	0.0%	4.5%	20.3%
	Moderate	0	0.0%	13.7%	0	0.0%	9.1%	18.6%
	Middle	2	40.0%	21.3%	372	59.5%	21.5%	20.9%
	Upper	1	20.0%	50.6%	102	16.3%	59.9%	40.2%
	Unknown	2	40.0%	7.3%	151	24.2%	5.0%	0.0%
	TOTAL	5	100.0%	100.0%	625	100.0%	100.0%	100.0%
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	20.3%
	Moderate	1	3.3%	0.4%	272	0.4%	0.0%	18.6%
	Middle	0	0.0%	0.4%	0	0.0%	0.0%	20.9%
	Upper	1	3.3%	4.7%	334	0.4%	1.0%	40.2%
	Unknown	28	93.3%	94.5%	76,247	99.2%	98.9%	0.0%
	TOTAL	30	100.0%	100.0%	76,853	100.0%	100.0%	100.0%
Other Purpose Line of Credit (LOC)	Low	0	0.0%	4.8%	0	0.0%	1.7%	20.3%
	Moderate	0	0.0%	14.9%	0	0.0%	9.0%	18.6%
	Middle	0	0.0%	17.7%	0	0.0%	11.9%	20.9%
	Upper	0	0.0%	50.0%	0	0.0%	61.6%	40.2%
	Unknown	0	0.0%	12.5%	0	0.0%	15.7%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Other Purpose Closed/Exempt	Low	0	0.0%	5.9%	0	0.0%	3.4%	20.3%
	Moderate	0	0.0%	18.7%	0	0.0%	13.6%	18.6%
	Middle	0	0.0%	23.4%	0	0.0%	19.8%	20.9%
	Upper	0	0.0%	46.8%	0	0.0%	58.7%	40.2%
	Unknown	0	0.0%	5.2%	0	0.0%	4.5%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Purpose Not Applicable	Low	0	0.0%	0.0%	0	0.0%	0.0%	20.3%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	18.6%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	20.9%
	Upper	0	0.0%	0.2%	0	0.0%	0.6%	40.2%
	Unknown	0	0.0%	99.8%	0	0.0%	99.4%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
HMDA TOTALS	Low	68	5.2%	6.2%	6,616	2.0%	2.9%	20.3%
	Moderate	182	13.9%	16.4%	25,334	7.6%	10.8%	18.6%
	Middle	298	22.7%	19.1%	51,968	15.5%	15.4%	20.9%
	Upper	619	47.1%	34.7%	151,965	45.5%	39.5%	40.2%
	Unknown	146	11.1%	23.7%	98,362	29.4%	31.3%	0.0%
	TOTAL	1,313	100.0%	100.0%	334,245	100.0%	100.0%	100.0%

As displayed in the preceding table, the bank's percentage of lending to low-income borrowers (5.2 percent) is similar to the HMDA aggregate lending level to low-income borrowers (6.2 percent) and below the low-income family population figure (20.3 percent), reflecting reasonable performance. The bank's level of lending to moderate-income borrowers (13.9 percent) is slightly

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below aggregate lending levels of 16.4 percent and the moderate-income family population percentage (18.6 percent), reflecting poor performance. When combined, the bank's LMI lending levels of 19.1 percent approach aggregate performance of 22.6 percent. Therefore, considering the reasonable performance to low-income borrowers and the bank's overall LMI lending levels, the bank's overall distribution of HMDA loans by borrower's profile is reasonable.

Next, small business loans were reviewed to determine the bank's lending levels to businesses of different sizes. The following table shows the distribution of 2020 small business loans by loan amount and business size compared to Dun & Bradstreet and aggregate data.

Small Business Loans by Revenue and Loan Size								
Assessment Area: Springfield								
Business Revenue and Loan Size		2020						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	736	63.9%	35.3%	\$48,328	39.9%	28.1%	91.1%
	Over \$1 Million/ Unknown	415	36.1%	64.7%	\$72,668	60.1%	71.9%	8.9%
	TOTAL	1151	100.0%	100.0%	\$120,996	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	846	73.5%	85.3%	\$25,045	20.7%	27.3%	
	\$100,001– \$250,000	170	14.8%	8.2%	\$28,213	23.3%	20.8%	
	\$250,001– \$1 Million	135	11.7%	6.5%	\$67,738	56.0%	51.9%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	1151	100.0%	100.0%	\$120,996	100.0%	100.0%	
Loan Size	R e v e n	\$100,000 or Less	631	85.7%		\$15,828	32.8%	
		\$100,001– \$250,000	52	7.1%		\$8,502	17.6%	
		\$250,001– \$1 Million	53	7.2%		\$23,998	49.7%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		TOTAL	736	100.0%		\$48,328	100.0%	

The bank's level of lending to small businesses is reasonable. The bank originated 63.9 percent of its small business loans to businesses with revenues of \$1 million or less. While assessment area demographics estimate that 91.1 percent of businesses in the assessment area had annual revenues of \$1 million or less, the bank's performance is substantially above the 2020 aggregate lending level to small businesses (35.3 percent).

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Geographic Distribution of Loans

As noted previously, the Springfield assessment area includes 5 low- and 21 moderate-income census tracts, representing 31.3 percent of all assessment area census tracts. Overall, the bank's geographic distribution of loans in this assessment area reflects reasonable penetration throughout these LMI census tracts, based on the HMDA and small business loan categories. The following table displays the geographic distribution of 2020 HMDA loans compared to owner-occupied housing demographics for the assessment area and aggregate data.

Geographic Distribution of Residential Real Estate Loans								
Assessment Area: Springfield								
Product Type	Tract Income Levels	2020						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	7	1.1%	2.5%	547	0.5%	1.3%	2.4%
	Moderate	66	10.8%	11.7%	8,940	7.7%	7.5%	14.5%
	Middle	393	64.3%	64.6%	69,636	60.2%	63.8%	60.5%
	Upper	145	23.7%	21.2%	36,547	31.6%	27.4%	22.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	611	100.0%	100.0%	115,670	100.0%	100.0%	100.0%
Refinance	Low	5	0.7%	0.9%	1,024	0.7%	0.4%	2.4%
	Moderate	37	5.5%	7.4%	4,871	3.5%	4.5%	14.5%
	Middle	396	59.4%	62.4%	79,130	56.1%	59.1%	60.5%
	Upper	229	34.3%	29.3%	56,072	39.7%	36.0%	22.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	667	100.0%	100.0%	141,097	100.0%	100.0%	100.0%
Home Improvement	Low	0	0.0%	3.6%	0	0.0%	2.0%	2.4%
	Moderate	0	0.0%	13.3%	0	0.0%	11.6%	14.5%
	Middle	4	80.0%	54.4%	505	80.8%	47.8%	60.5%
	Upper	1	20.0%	28.6%	120	19.2%	38.6%	22.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	5	100.0%	100.0%	625	100.0%	100.0%	100.0%
Multifamily	Low	4	13.3%	14.0%	4,116	5.4%	12.6%	8.3%
	Moderate	9	30.0%	25.5%	7,201	9.4%	18.5%	40.7%
	Middle	14	46.7%	47.7%	61,196	79.6%	54.7%	41.2%
	Upper	3	10.0%	9.8%	4,340	5.6%	13.6%	7.4%
	Unknown	0	0.0%	3.0%	0	0.0%	0.6%	2.3%
	TOTAL	30	100.0%	100.0%	76,853	100.0%	100.0%	100.0%

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Other Purpose LOC	Low	0	0.0%	0.8%	0	0.0%	0.6%	2.4%
	Moderate	0	0.0%	5.2%	0	0.0%	4.1%	14.5%
	Middle	0	0.0%	65.7%	0	0.0%	55.8%	60.5%
	Upper	0	0.0%	28.2%	0	0.0%	39.5%	22.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Other Purpose Closed/Exempt	Low	0	0.0%	0.7%	0	0.0%	0.4%	2.4%
	Moderate	0	0.0%	8.0%	0	0.0%	4.9%	14.5%
	Middle	0	0.0%	61.4%	0	0.0%	56.7%	60.5%
	Upper	0	0.0%	30.0%	0	0.0%	38.0%	22.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Purpose Not Applicable	Low	0	0.0%	3.7%	0	0.0%	2.4%	2.4%
	Moderate	0	0.0%	13.9%	0	0.0%	8.5%	14.5%
	Middle	0	0.0%	68.8%	0	0.0%	72.9%	60.5%
	Upper	0	0.0%	13.7%	0	0.0%	16.2%	22.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
HMDA TOTALS	Low	16	1.2%	1.8%	5,687	1.7%	2.2%	2.4%
	Moderate	112	8.5%	9.7%	21,012	6.3%	7.4%	14.5%
	Middle	807	61.5%	63.2%	210,467	63.0%	60.5%	60.5%
	Upper	378	28.8%	25.2%	97,079	29.0%	29.8%	22.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.1%	0.0%
	TOTAL	1,313	100.0%	100.0%	334,245	100.0%	100.0%	100.0%

The analysis of HMDA loans revealed reasonable lending performance to borrowers residing in low-income geographies. The bank's total penetration of low-income census tracts by number of loans (1.2 percent) is similar to both the percentage of owner-occupied housing units in low-income census tracts (2.4 percent) and the percentage of loans by other lenders in the assessment area based on 2020 HMDA aggregate data (1.8 percent).

The bank's total penetration of moderate-income census tracts by number of loans (8.5 percent) is below the percentage of owner-occupied housing units in moderate-income census tracts (14.5 percent). However, the bank's performance in moderate-income census tracts is similar to that of other lenders based on aggregate lending data, which indicates that 9.7 percent of aggregate HMDA loans inside this assessment area were made to borrowers residing in moderate-income census tracts. Therefore, bank performance in moderate-income census tracts is deemed reasonable.

Next, the bank's geographic distribution of small business loans was reviewed. The following table displays small business loan activity by geography income level compared to the location of businesses throughout this assessment area and 2020 small business aggregate data.

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Geographic Distribution of Small Business Loans							
Assessment Area: Springfield							
Tract Income Levels	2020						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	15	1.3%	1.9%	\$4,498	3.7%	2.1%	2.4%
Moderate	324	28.1%	25.0%	\$34,742	28.7%	33.8%	25.1%
Middle	626	54.4%	54.1%	\$62,944	52.0%	46.8%	54.6%
Upper	184	16.0%	18.5%	\$18,781	15.5%	16.9%	17.6%
Unknown	2	0.2%	0.5%	\$31	0.0%	0.3%	0.3%
TOTAL	1,151	100.0%	100.0%	\$120,996	100.0%	100.0%	100.0%

The bank's level of lending in low-income census tracts (1.3 percent) is similar to both the estimated percentage of businesses operating inside these census tracts (2.4 percent) and aggregate lending levels in low-income census tracts (1.9 percent). Accordingly, the bank's performance in low-income areas is reasonable. The bank's percentage of loans in moderate-income census tracts (28.1 percent) is slightly above both the 2020 aggregate lending percentage in moderate-income census tracts (25.0 percent) and the percentage of small businesses in moderate-income census tracts (25.1 percent), also representing reasonable performance. Therefore, the bank's overall geographic distribution of small business loans is reasonable.

Finally, based on reviews from both loan categories, the bank had loan activity in all of the assessment area census tracts, including all LMI tracts. Therefore, no conspicuous lending gaps were noted in LMI areas.

COMMUNITY DEVELOPMENT TEST

The bank demonstrates excellent responsiveness to community development needs within the Springfield assessment area, considering the bank's capacity and the need and availability of such opportunities for community development. The bank addressed these needs through community development loans, investments, and services.

During the review period, the bank extended 100 community development loans totaling \$139.8 million in this assessment area. Almost half of these loans were made to rehabilitate and retain a range of existing businesses to revitalize/stabilize LMI census tracts. Ten loans were extended to help small businesses by funding expansions and the hiring of additional staff. The remainder were to organizations or individuals providing affordable housing in LMI census tracts.

The bank made \$3.4 million in new investments, all of which were MBS providing affordable housing to LMI borrowers. The bank also retained a prior period qualifying investment of \$105,000 that was still outstanding. Additionally, the bank made 141 donations totaling \$234 thousand in this assessment area. Specifically, the bank donated \$100 thousand to the Low Income Insulation Program, to assist LMI homeowners remain in their homes by making home improvements that lower detrimental utility cost. Finally, 57 bank employees provided 927 service hours to 29 community development organizations in this assessment area during the review

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period. Of these services 121 were to the Junior Achievement Financial Literacy program taught at schools in which the majority of the students are part of LMI families.

NONMETROPOLITAN MISSOURI STATEWIDE AREA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE WESTERN MISSOURI ASSESSMENT AREA

This assessment area includes the entirety of Camden, Hickory, and Henry Counties, and part of Benton County, all in Missouri. The bank operates eight offices in this assessment area. The tables below detail key demographics relating to this assessment area.

Assessment Area Demographics by Population Income Level					
Demographic Type	Population Income Level				TOTAL
	Low-	Moderate-	Middle-	Upper-	
Family Population	4,343	4,390	4,781	9,227	22,740
	19.1%	19.3%	21.0%	40.6%	100%
Household Population	6,843	5,568	6,120	14,681	33,212
	20.6%	16.8%	18.4%	44.2%	100%

Assessment Area Demographics by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Census Tracts	0	3	14	5	0	22
	0.0%	13.6%	63.6%	22.7%	0.0%	100%
Family Population	0	3,139	14,740	4,861	0	22,740
	0.0%	13.8%	64.8%	21.4%	0.0%	100%
Household Population	0	4,567	22,139	6,506	0	33,212
	0.0%	13.7%	66.7%	19.6%	0.0%	100%
Business Institutions	0	246	2,672	908	0	3,826
	0.0%	6.4%	69.8%	23.7%	0.0%	100%

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE WESTERN MISSOURI ASSESSMENT AREA**LENDING TEST**

The bank's Lending Test performance in this assessment area is consistent with the bank's Lending Test performance in the assessment area within the MSA portion of the state of Missouri that was reviewed using full-scope procedures, as detailed in the following table. For more detailed information relating to the bank's Lending Test performance in this assessment area, see the tables in *Appendix A*.

Lending Test Criteria	Performance
Distribution of Loans by Borrower's Profile	Consistent
Geographic Distribution of Loans	Consistent
OVERALL	Consistent

COMMUNITY DEVELOPMENT TEST

The bank's Community Development Test performance in this assessment area is consistent with the bank's Community Development Test performance in the assessment area within the MSA portion of the state of Missouri that was reviewed using full-scope procedures.

During the review period, the bank made 27 community development loans totaling \$16.7 million in its Western Missouri assessment area. A majority of the loans were made to rehabilitate and retain a range of existing businesses and to help revitalize/stabilize LMI and distressed/underserved middle-income census tracts. The remainder funded organizations or individuals providing affordable housing in LMI census tracts, benefited school districts with a majority of students eligible for the free/reduced lunch program, and helped expand small businesses.

Additionally, the bank made one new investment totaling \$201 thousand and retained two investments totaling \$170 thousand. The bank also made 107 donations totaling \$86 thousand. Finally, 31 employees provided 930 service hours to 21 different community development organizations in this assessment area during the review period.

JOPLIN, MISSOURI METROPOLITAN STATISTICAL AREA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE JOPLIN MSA ASSESSMENT AREA

This assessment area includes the entirety of Jasper and Newton Counties in Missouri. The bank operates one office in this assessment area. During the review period, the bank converted an existing LPO in Joplin, Missouri, to a full-service branch and added the Joplin, Missouri MSA assessment area. The tables below detail key demographics relating to this assessment area.

Assessment Area Demographics by Population Income Level					
Demographic Type	Population Income Level				TOTAL
	Low-	Moderate-	Middle-	Upper-	
Family Population	9,062	8,307	9,655	18,455	45,479
	19.9%	18.3%	21.2%	40.6%	100%
Household Population	14,973	11,679	12,723	28,240	67,615
	22.1%	17.2%	18.8%	41.8%	100%

Assessment Area Demographics by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Census Tracts	0	6	23	5	0	34
	0.0%	17.7%	67.7%	14.7%	0.0%	100%
Family Population	0	5,739	31,783	7,957	0	45,479
	0.0%	12.6%	69.9%	17.5%	0.0%	100%
Household Population	0	10,304	46,142	11,169	0	67,615
	0.0%	15.4%	68.2%	16.5%	0.0%	100%
Business Institutions	0	1,216	4,360	858	0	6,434
	0.0%	18.9%	67.8%	13.3%	0.0%	100%

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE JASPER AND
NEWTON COUNTY ASSESSMENT AREA****LENDING TEST**

The bank's Lending Test performance in this assessment area is consistent with the bank's Lending Test performance in the assessment area within the MSA portion of the state of Missouri that was reviewed using full-scope procedures, as detailed in the following table. For more detailed information relating to the bank's Lending Test performance in this assessment area, see the tables in *Appendix A*.

Lending Test Criteria	Performance
Distribution of Loans by Borrower's Profile	Below
Geographic Distribution of Loans	Consistent
OVERALL	Consistent

COMMUNITY DEVELOPMENT TEST

The bank's Community Development Test performance in this assessment area is below the bank's Community Development Test performance in the assessment area within the MSA portion of the state of Missouri that was reviewed using full-scope procedures.

During the review period, the bank made ten community development loans totaling \$18.9 million in the Joplin MSA assessment area. Three of the loans were made to revitalize/stabilize LMI census tracts. The remaining loans were made for economic development purposes or to organizations and individuals providing affordable housing in LMI census tracts.

Additionally, the bank made one new investment totaling \$535 thousand. The bank also made two donations totaling \$16 thousand, and three employees provided 13.5 service hours to one community development organization in this assessment area.

Kansas

CRA RATING FOR Kansas:	Satisfactory
The Lending Test is rated:	Satisfactory
The Community Development Test is rated:	Outstanding

Major factors supporting the institution's Kansas rating include the following:

- The borrower's distribution of loans reflects reasonable penetration among individuals of different income levels, including LMI levels, and businesses of different sizes.
- The geographic distribution of loans reflects reasonable dispersion throughout the Kansas assessment areas.
- The bank's community development performance demonstrates excellent responsiveness to community development needs through community development loans, qualified investments, and community development services, considering the need and availability for such opportunities for community development in the bank's Kansas assessment areas.

SCOPE OF EXAMINATION

Scoping considerations applicable to the review of the Kansas assessment area is consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section. The bank's assessment area is located in the Kansas City MSA and was evaluated using full-scope review procedures. The bank operates one branch in the Kansas City assessment area that was opened during the review period.

As previously noted, the bank also opened a branch in nonMSA Kansas (Franklin County); however, due to the nonMSA branch's opening date being in close proximity to the start of the examination, a review of the bank's performance in the nonMSA assessment area using the applicable intermediate small bank procedures was not possible. Therefore, the bank's ratings in the state of Kansas only reflect the bank's performance in the Kansas City assessment area.

To augment the evaluation of the full-scope review assessment area, one community contact interview was utilized to ascertain specific community credit needs, community development opportunities, and local economic conditions. The interview was with a representative specializing in economic development. Details from the interview are included in the *Description of Institution's Operations* section of the Kansas City assessment area.

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DESCRIPTION OF INSTITUTION'S OPERATIONS IN KANSAS

Bank Structure

The bank operates one office, which opened during the review period, in this assessment area representing 5.9 percent of total offices. The bank also operates a mortgage LPO in this assessment area. No offices were closed in this assessment area during the review period. Based on this branch network and other service delivery systems, the bank is adequately positioned to deliver financial services to much of its assessment area.

General Demographics

The assessment area is composed of Jackson County, Missouri, and Johnson and Wyandotte Counties, both located in Kansas, which accounts for 3 of 14 counties that make up Kansas City, Missouri-Kansas MSA. The assessment area is located on the border of the states of Kansas and Missouri. Per 2015 ACS data, the assessment area population was 1,408,525. The assessment area has a highly competitive banking market. Of the 74 FDIC-insured depository institutions with a branch presence in this assessment area, the bank ranked 72nd in deposit market share, encompassing only 0.03 percent of total deposits.

Credit needs in the assessment area include a mix of consumer and business loan products. For this assessment area, the community contact noted the need for affordable housing, home improvement loans, down payment assistance programs, and financial literacy programs. Additionally, the contact identified a need for capital support for unbanked small business owners.

Income and Wealth Demographics

The following table summarizes the distribution of assessment area census tracts by income level and family population in those tracts.

Assessment Area Demographics by Geography Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown	TOTAL
Census Tracts	78	87	107	109	18	399
	19.5%	21.8%	26.8%	27.3%	4.5%	100%
Family Population	38,810	71,404	109,092	129,417	988	349,711
	11.1%	20.4%	31.2%	37.0%	0.3%	100%

As shown in the preceding table, 41.3 percent of the census tracts in the assessment area are in LMI geographies, but only 31.5 percent of the family population resides in these tracts.

Based on the 2015 ACS data, the median family income for the assessment area was \$72,207. At the same time, the median family income for the state of Kansas was \$66,389 and the state of Missouri was 60,809. More recently, the FFIEC estimates the 2020 median family income for the

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Kansas City, Missouri-Kansas MSA to be \$85,900. The following table displays population percentages of assessment area families by income level compared to Missouri and Kansas family population.

Family Population by Income Level					
Dataset	Low-	Moderate-	Middle-	Upper-	TOTAL
Assessment Area	77,980	60,169	68,275	143,287	349,711
	22.3%	17.2%	19.5%	41.0%	100%
State of Kansas	137,650	128,930	154,601	308,287	729,468
	18.9%	17.7%	21.2%	42.3%	100%
State of Missouri	327,271	274,380	319,267	609,088	1,530,006
	21.4%	17.9%	20.9%	39.8%	100%

As shown in the preceding table, 39.5 percent of families in the assessment area were considered LMI, which is similar to the LMI family percentages in Kansas and Missouri (36.6 and 39.3 percent, respectively). Additionally, the percentage of families living below the poverty level in the assessment area, 10.0 percent, is similar to 9.1 percent in the state of Kansas and 11.1 percent in the state of Missouri. Considering these factors, income levels in the assessment area reflect those of the states of Kansas and Missouri as a whole.

Housing Demographics

Housing Demographics			
Dataset	Median Housing Value	Affordability Ratio	Median Gross Rent (monthly)
Assessment Area	\$161,013	34.8%	\$850
State of Kansas	\$132,000	40.0%	\$757
State of Missouri	\$138,400	34.8%	\$746

As displayed in the preceding table, housing in the assessment area appears to be less affordable than in the state of Kansas and the state of Missouri. The median housing value for the assessment area was \$161,013, which is well above the figures for Kansas and Missouri. When considering income levels, housing in the assessment area appears to be less affordable than in the state of Kansas and similarly affordable to housing stock in Missouri. Finally, the median gross rent in the assessment area (\$850) is greater than in the state of Kansas (\$757) and the state of Missouri (\$746).

Industry and Employment Demographics

The assessment area supports a diverse business community, including a strong small business sector, as evidenced by Dun & Bradstreet data that indicates 89.9 percent of businesses in the assessment area have annual revenues of less than \$1 million. County business patterns indicate there are 699,197 paid employees in the assessment area. By percentage of employees, the three

largest job categories in the assessment area are healthcare and social assistance (16.4 percent), followed by retail trade (11.1 percent), and professional and technical services (11.0 percent). The table below details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area as a whole, and the states of Kansas and Missouri.

Unemployment Levels			
Time Period (Annual Average)	Assessment Area	State of Kansas	State of Missouri
2021	4.2%	3.2%	4.4%
2020	6.2%	5.7%	6.1%
2019	3.3%	3.1%	3.1%

As shown in the preceding table, unemployment levels for the assessment area, as well as the states of Kansas and Missouri, increased in 2020 largely due to the COVID-19 pandemic. The unemployment rate has declined since reaching its peak in 2020. Additionally, unemployment levels in the assessment area are consistently higher than in the state of Kansas and comparable to the state of Missouri.

Community Contact Information

For the Kansas City assessment area, one community contact interview was referenced as part of this evaluation. The interviewee was a representative from an economic development organization. The community contact interviewee categorized the local economy as doing as well as can be expected in a changing environment. The contact spoke to the needs of small business owners, stating there is a need for start-up capital and loans for small businesses. As banks typically have restrictions and standardizations, borrowers in the area often rely on private investors. The contact indicated that barriers for business growth and start-ups include business owners being unbanked or lack of credit history. Further, many potential business owners need resources for business plan development and education on running a business. Finally, workforce development is a common need. According to the contact, there are many opportunities for banks to be involved in community development activities.

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE KANSAS CITY ASSESSMENT AREA

LENDING TEST

The bank's Lending Test rating in the Kansas City assessment area is satisfactory. The bank's overall distribution of loans by borrower's income/revenue profile reflects reasonable penetration among borrowers of different income levels and businesses of different revenue sizes. Furthermore, the overall geographic distribution of loans reflects reasonable penetration throughout the Kansas City assessment area.

Loan Distribution by Borrower's Profile

Overall, the bank's loan distribution by borrower's profile is reasonable, based on performance from the loan categories reviewed, with primary emphasis on the bank's HMDA lending.

Borrowers are classified into low-, moderate-, middle-, and upper-income categories by comparing their reported income to the applicable median family income figure as estimated by the FFIEC (\$85,900 for the Kansas City MSA as of 2020). The following table shows the distribution of HMDA-reported loans by borrower income level compared to family population income demographics for the assessment area. Additionally, 2020 aggregate data for the assessment area is displayed.

Borrower Distribution of Residential Real Estate Loans								
Assessment Area: Kansas City								
Product Type	Borrower Income Levels	2020						
		Count			Dollar			Families
		Bank	HMDA Aggregate	Bank	HMDA Aggregate			
	#	%	%	\$ (000s)	\$ %	\$ %	%	
Home Purchase	Low	5	3.1%	9.9%	666	1.6%	5.1%	22.3%
	Moderate	29	17.8%	22.4%	5,921	14.1%	16.5%	17.2%
	Middle	34	20.9%	21.6%	8,319	19.8%	20.8%	19.5%
	Upper	71	43.6%	33.9%	24,717	58.8%	46.4%	41.0%
	Unknown	24	14.7%	12.2%	2,416	5.7%	11.1%	0.0%
	TOTAL	163	100.0%	100.0%	42,039	100.0%	100.0%	100.0%
Refinance	Low	5	1.5%	4.3%	754	0.8%	2.0%	22.3%
	Moderate	49	14.8%	14.3%	9,702	10.8%	9.6%	17.2%
	Middle	57	17.3%	21.2%	13,388	14.8%	18.2%	19.5%
	Upper	209	63.3%	43.1%	63,101	69.9%	53.1%	41.0%
	Unknown	10	3.0%	17.1%	3,284	3.6%	17.1%	0.0%
	TOTAL	330	100.0%	100.0%	90,229	100.0%	100.0%	100.0%

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Home Improvement	Low	0	0.0%	5.8%	0	0.0%	3.3%	22.3%
	Moderate	0	0.0%	11.5%	0	0.0%	8.0%	17.2%
	Middle	0	0.0%	20.1%	0	0.0%	17.0%	19.5%
	Upper	0	0.0%	57.6%	0	0.0%	64.9%	41.0%
	Unknown	0	0.0%	5.0%	0	0.0%	6.8%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Multifamily	Low	0	0.0%	0.4%	0	0.0%	0.0%	22.3%
	Moderate	0	0.0%	2.7%	0	0.0%	0.1%	17.2%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	19.5%
	Upper	0	0.0%	4.7%	0	0.0%	0.4%	41.0%
	Unknown	9	100.0%	92.2%	8,293	100.0%	99.5%	0.0%
	TOTAL	9	100.0%	100.0%	8,293	100.0%	100.0%	100.0%
Other Purpose LOC	Low	0	0.0%	3.7%	0	0.0%	1.8%	22.3%
	Moderate	0	0.0%	14.3%	0	0.0%	7.8%	17.2%
	Middle	0	0.0%	20.3%	0	0.0%	14.8%	19.5%
	Upper	0	0.0%	59.0%	0	0.0%	73.3%	41.0%
	Unknown	0	0.0%	2.7%	0	0.0%	2.3%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Other Purpose Closed/Exempt	Low	0	0.0%	8.8%	0	0.0%	3.5%	22.3%
	Moderate	0	0.0%	17.1%	0	0.0%	10.3%	17.2%
	Middle	0	0.0%	22.2%	0	0.0%	16.3%	19.5%
	Upper	0	0.0%	45.7%	0	0.0%	63.5%	41.0%
	Unknown	0	0.0%	6.2%	0	0.0%	6.5%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Purpose Not Applicable	Low	0	0.0%	0.2%	0	0.0%	0.1%	22.3%
	Moderate	0	0.0%	0.1%	0	0.0%	0.0%	17.2%
	Middle	0	0.0%	0.1%	0	0.0%	0.0%	19.5%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	41.0%
	Unknown	0	0.0%	99.7%	0	0.0%	99.9%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
HMDA TOTALS	Low	10	2.0%	6.3%	1,420	1.0%	3.0%	22.3%
	Moderate	78	15.5%	16.8%	15,623	11.1%	11.5%	17.2%
	Middle	91	18.1%	20.8%	21,707	15.4%	18.0%	19.5%
	Upper	280	55.8%	39.5%	87,818	62.5%	47.8%	41.0%
	Unknown	43	8.6%	16.6%	13,993	10.0%	19.7%	0.0%
	TOTAL	502	100.0%	100.0%	140,561	100.0%	100.0%	100.0%

As displayed in the preceding table, the bank's percentage of lending to low-income borrowers (2.0 percent) is substantially below the low-income family population figure (22.3 percent) and below the 2020 HMDA aggregate lending level to low-income borrowers (6.3 percent), reflecting poor performance. However, the bank's lending to moderate-income borrowers (15.5 percent) is

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similar to the moderate-income family population percentage (17.2 percent) and aggregate lending levels of 16.8 percent, reflecting reasonable performance. Despite high levels of competition in the area, the bank's combined LMI lending levels (17.5 percent) approach aggregate performance (23.1 percent). It is worth noting that the bank has responded to the credit needs of LMI borrowers in this assessment area by developing an in-house, fixed rate mortgage loan product that offers 100 percent financing with no credit score minimum. This demonstrates a willingness to meet the credit needs of LMI borrowers. Therefore, considering performance to both income categories, the bank's overall distribution of HMDA loans by borrower's profile is reasonable.

Next, small business loans were reviewed to determine the bank's lending levels to business of different sizes. The following table shows the distribution of 2020 small business loans by loan amount and business revenue size compared to Dun & Bradstreet and aggregate data.

Small Business Loans by Revenue and Loan Size								
Assessment Area: Kansas City								
Business Revenue and Loan Size		2020						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	74	45.4%	37.2%	\$7,436	39.3%	20.6%	89.9%
	Over \$1 Million/Unknown	89	54.6%	62.8%	\$11,464	60.7%	79.4%	10.1%
	TOTAL	163	100.0%	100.0%	\$18,900	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	119	73.0%	83.1%	\$2,699	14.3%	23.5%	
	\$100,001–\$250,000	17	10.4%	8.7%	\$2,935	15.5%	19.2%	
	\$250,001–\$1 Million	27	16.6%	8.2%	\$13,266	70.2%	57.3%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	163	100.0%	100.0%	\$18,900	100.0%	100.0%	
Loan Size	Revenue	\$100,000 or Less	57	77.0%		\$1,124	15.1%	
		\$100,001–\$250,000	7	9.5%		\$1,306	17.6%	
		\$250,001–\$1 Million	10	13.5%		\$5,006	67.3%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
	TOTAL	74	100.0%		\$7,436	100.0%		

The bank's level of lending to small businesses is reasonable. The bank originated 45.4 percent of its small business loans to business with annual revenues of \$1 million or less. While assessment area demographics estimate that 89.9 percent of businesses in the assessment area had annual revenues of \$1 million or less, the bank's performance is above the 2020 aggregate lending level to small businesses (37.2 percent).

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As noted previously, the Kansas City assessment area includes 78 low-income census tracts and 87 moderate-income census tracts, representing 41.3 percent of all assessment area census tracts. Overall, the bank's geographic distribution of loans in this assessment area is reasonable, based on the two loan categories reviewed. The following table displays the geographic distribution of 2020 HMDA loans compared to owner-occupied housing demographics for the assessment area and aggregate data.

Geographic Distribution of Residential Real Estate Loans								
Assessment Area: Kansas City								
Product Type	Tract Income Levels	2020						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
	#	%	%	\$ (000s)	\$ %	\$ %	%	
Home Purchase	Low	21	12.9%	5.4%	1,634	3.9%	2.6%	8.2%
	Moderate	14	8.6%	17.3%	1,774	4.2%	10.3%	18.3%
	Middle	37	22.7%	33.7%	8,364	19.9%	28.8%	32.6%
	Upper	91	55.8%	43.3%	30,267	72.0%	57.9%	40.7%
	Unknown	0	0.0%	0.3%	0	0.0%	0.3%	0.2%
	TOTAL	163	100.0%	100.0%	42,039	100.0%	100.0%	100.0%
Refinance	Low	4	1.2%	1.7%	563	0.6%	1.0%	8.2%
	Moderate	12	3.6%	8.8%	1,800	2.0%	5.0%	18.3%
	Middle	65	19.7%	29.4%	13,943	15.5%	23.3%	32.6%
	Upper	249	75.5%	59.9%	73,923	81.9%	70.6%	40.7%
	Unknown	0	0.0%	0.2%	0	0.0%	0.2%	0.2%
	TOTAL	330	100.0%	100.0%	90,229	100.0%	100.0%	100.0%
Home Improvement	Low	0	0.0%	3.4%	0	0.0%	2.0%	8.2%
	Moderate	0	0.0%	9.4%	0	0.0%	6.3%	18.3%
	Middle	0	0.0%	27.8%	0	0.0%	22.9%	32.6%
	Upper	0	0.0%	59.3%	0	0.0%	68.6%	40.7%
	Unknown	0	0.0%	0.2%	0	0.0%	0.1%	0.2%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Multifamily	Low	1	11.1%	21.4%	742	8.9%	17.5%	17.9%
	Moderate	2	22.2%	32.7%	1,370	16.5%	12.1%	23.5%
	Middle	3	33.3%	28.8%	2,095	25.3%	47.1%	33.7%
	Upper	3	33.3%	16.7%	4,086	49.3%	23.2%	23.1%
	Unknown	0	0.0%	0.4%	0	0.0%	0.1%	2.0%
	TOTAL	9	100.0%	100.0%	8,293	100.0%	100.0%	100.0%

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Other Purpose LOC	Low	0	0.0%	2.1%	0	0.0%	1.0%	8.2%
	Moderate	0	0.0%	10.3%	0	0.0%	5.7%	18.3%
	Middle	0	0.0%	26.4%	0	0.0%	19.3%	32.6%
	Upper	0	0.0%	61.0%	0	0.0%	73.6%	40.7%
	Unknown	0	0.0%	0.2%	0	0.0%	0.4%	0.2%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Other Purpose Closed/Exempt	Low	0	0.0%	5.2%	0	0.0%	2.5%	8.2%
	Moderate	0	0.0%	14.4%	0	0.0%	6.1%	18.3%
	Middle	0	0.0%	33.2%	0	0.0%	21.8%	32.6%
	Upper	0	0.0%	47.0%	0	0.0%	69.4%	40.7%
	Unknown	0	0.0%	0.2%	0	0.0%	0.2%	0.2%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Purpose Not Applicable	Low	0	0.0%	6.3%	0	0.0%	3.5%	8.2%
	Moderate	0	0.0%	27.6%	0	0.0%	18.1%	18.3%
	Middle	0	0.0%	38.7%	0	0.0%	38.0%	32.6%
	Upper	0	0.0%	27.3%	0	0.0%	40.3%	40.7%
	Unknown	0	0.0%	0.1%	0	0.0%	0.1%	0.2%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
HMDA TOTALS	Low	26	5.2%	3.3%	2,939	2.1%	2.4%	8.2%
	Moderate	28	5.6%	12.4%	4,944	3.5%	7.5%	18.3%
	Middle	105	20.9%	31.1%	24,402	17.4%	26.6%	32.6%
	Upper	343	68.3%	53.0%	108,276	77.0%	63.3%	40.7%
	Unknown	0	0.0%	0.2%	0	0.0%	0.2%	0.2%
	TOTAL	502	100.0%	100.0%	140,561	100.0%	100.0%	100.0%

The analysis of HMDA loans revealed reasonable lending performance to borrowers residing in low-income geographies. The bank's total penetration of low-income census tracts (5.2 percent) is below the percentage of owner-occupied housing units in the low-income census tracts (8.2 percent). However, the bank's performance in low-income census tracts is above that of other lenders based on aggregate lending data, which indicates that 3.3 percent of aggregate HMDA loans were made to borrowers residing in low-income census tracts. This performance in low-income census tracts is deemed reasonable and is especially notable considering the bank's very small deposit market share and the high level of banking competition in the area.

The bank's total penetration of moderate-income census tracts by number of loans (5.6 percent) is below both the percentage of owner-occupied housing units in moderate-income census tracts (18.3 percent) and aggregate performance (12.4 percent). Therefore, bank performance in moderate-income census tracts is deemed poor.

Despite high levels of competition, the bank's combined LMI lending levels (10.8 percent) approach aggregate performance (15.7 percent). As previously noted, the bank offers a special mortgage loan product; the product is offered to both LMI borrowers and borrowers in LMI

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geographies, which demonstrates a willingness to meet credit needs in LMI census tracts. Given the noted performance context and when considering performance to both income categories, the bank's overall distribution of HMDA loans by borrower's profile is reasonable.

Next, the bank's geographic distribution of small business loans was reviewed. The following table displays 2020 small business loan activity by geography income level compared to the location of businesses throughout this assessment area and 2020 small business aggregate data.

Geographic Distribution of Small Business Loans							
Assessment Area: Partial Kansas City, Missouri MSA							
Tract Income Levels	2020						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	34	20.9%	8.3%	\$4,838	25.6%	10.4%	9.1%
Moderate	44	27.0%	16.3%	\$5,048	26.7%	15.6%	18.0%
Middle	28	17.2%	27.8%	\$3,295	17.4%	27.2%	30.6%
Upper	51	31.3%	44.2%	\$4,923	26.0%	39.6%	39.8%
Unknown	6	3.7%	3.4%	\$796	4.2%	7.3%	2.4%
TOTAL	163	100.0%	100.0%	\$18,900	100.0%	100.0%	100.0%

As displayed in the preceding table, the bank's level of lending in low-income census tracts (20.9 percent) is above both the 2020 aggregate lending percentage in low-income census tracts (8.3 percent) and the percentage of small businesses in low-income census tracts (9.1 percent), representing excellent performance. The bank's percentage of loans in moderate-income tracts (27.0 percent) is also above the 2020 aggregate lending percentage in moderate-income census tracts (16.3 percent) and the percentage of small businesses in moderate-income census tracts (18.0 percent), representing excellent performance. Therefore, the bank's overall geographic distribution of small business loans is excellent.

Lastly, based on reviews from both loan categories, the bank had loan activity in 58.0 percent of all assessment area census tracts, and activity in 58.2 percent of the assessment area's LMI tracts. Given the bank's low deposit market share in the assessment area, and the relative newness of its sole branch in the assessment area, this performance is considered reasonable. Additionally, no conspicuous lending gaps were noted in LMI areas.

COMMUNITY DEVELOPMENT TEST

The bank demonstrates excellent responsiveness to community development needs within the Kansas City assessment area, considering the bank's capacity and the need and availability of such opportunities for community development. The bank addressed these needs through community development loans, qualified investments, and community development services.

During the review period, the bank extended 27 community development loans totaling \$32.6 million in this assessment area. These loans primarily helped revitalize/stabilize LMI geographies and financed affordable rental housing. In addition, the bank made one new investment totaling

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\$233 thousand and 14 donations totaling \$22 thousand in this assessment area. Of the donations, \$12 thousand was to Everfi, an organization teaching financial literacy at schools where the majority of the students are a part of LMI families. Finally, 3 bank employees provided 47 service hours to 2 community development organizations in this assessment area.

SCOPE OF EXAMINATION TABLES

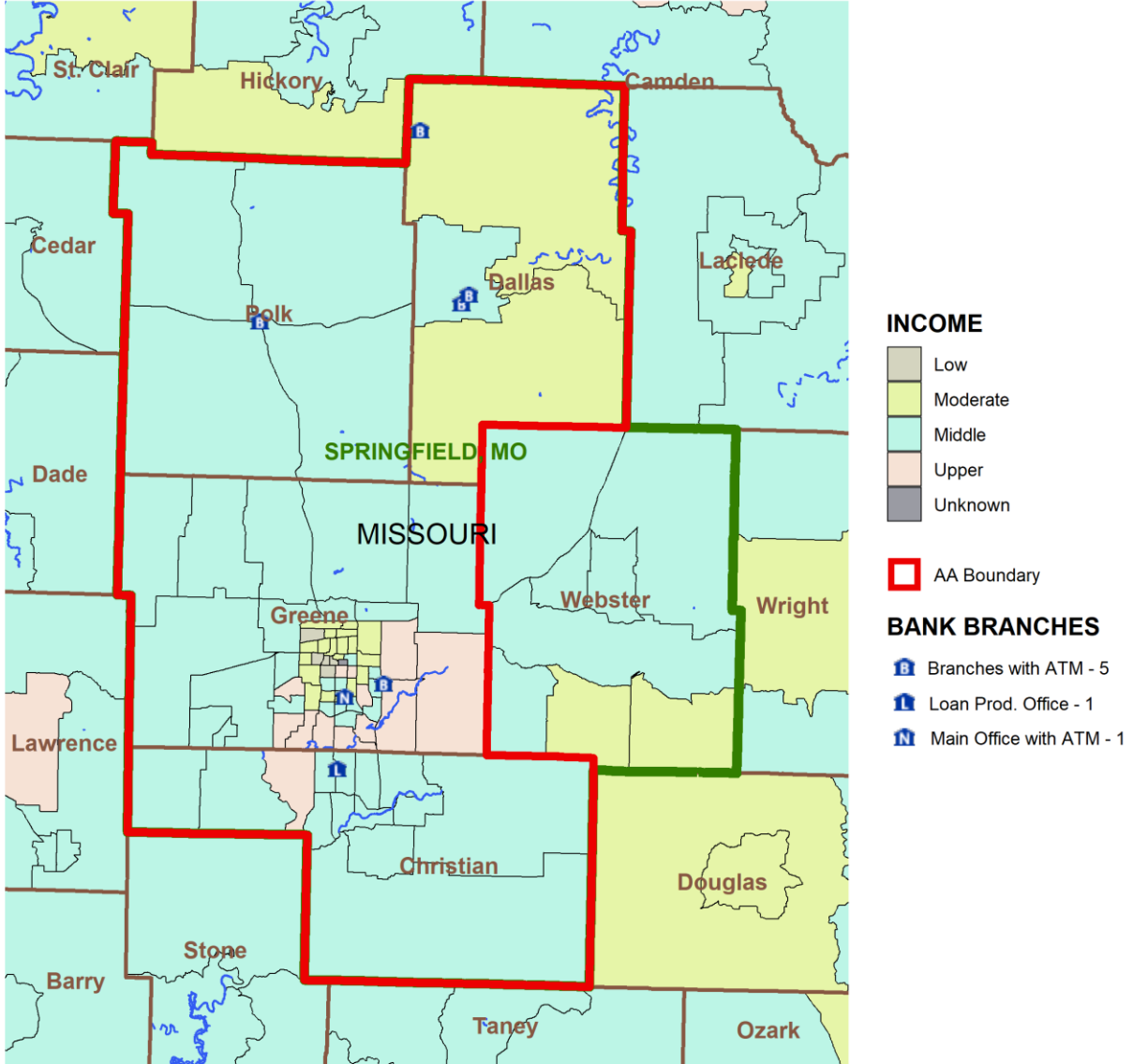
Scope of Examination			
TIME PERIOD REVIEWED	January 1, 2020 – December 31, 2020 for HMDA and small business lending. August 20, 2018 – June 12, 2022 for community development loans, investments, donations and service activities.		
FINANCIAL INSTITUTION			PRODUCTS REVIEWED
OakStar Bank			HMDA Small Business
AFFILIATE(S)	AFFILIATE RELATIONSHIP		PRODUCTS REVIEWED
N/A	N/A		N/A

Assessment Area – Examination Scope Details					
Assessment Area	Rated Area	# of Offices	Deposits (\$000s) (as of June 30, 2021)	Branches Visited	CRA Review Procedures
Springfield	Missouri	6	\$1,036,776	0	Full Scope
Western Missouri	Missouri	8	\$437,350	0	Limited Scope
Joplin, Missouri MSA	Missouri	1	\$17,020	0	Limited Scope
Kansas City	Kansas	1	\$23,097	0	Full Scope
NonMSA Kansas	Kansas	1	\$0	0	N/A
OVERALL		17	\$1,514,243	0	2 Full Scope

ASSESSMENT AREA DETAIL

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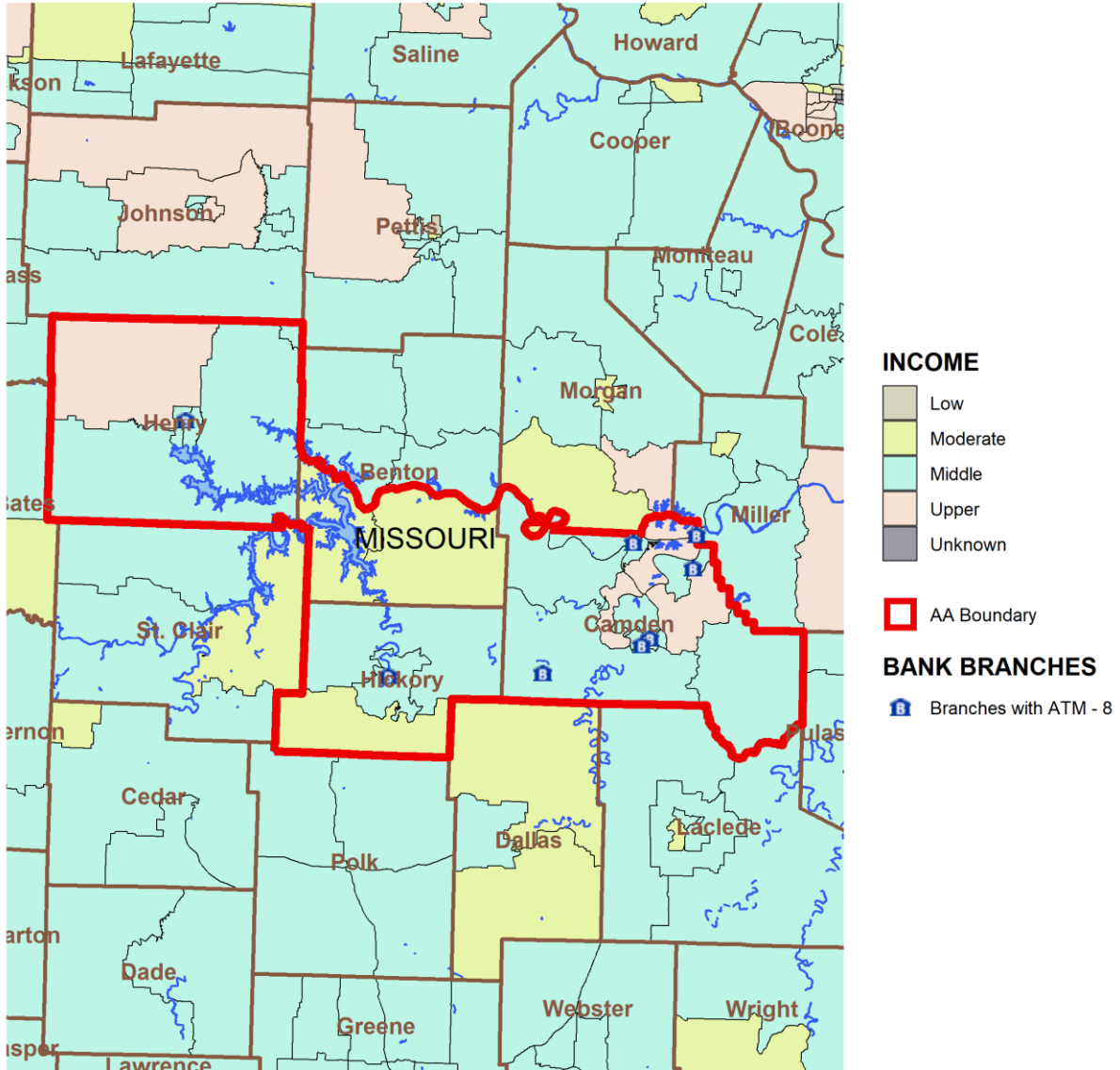
Springfield, MO partial MSA AA 2020 - Tract Income



ASSESSMENT AREA DETAIL

Oakstar Bk - Springfield MO

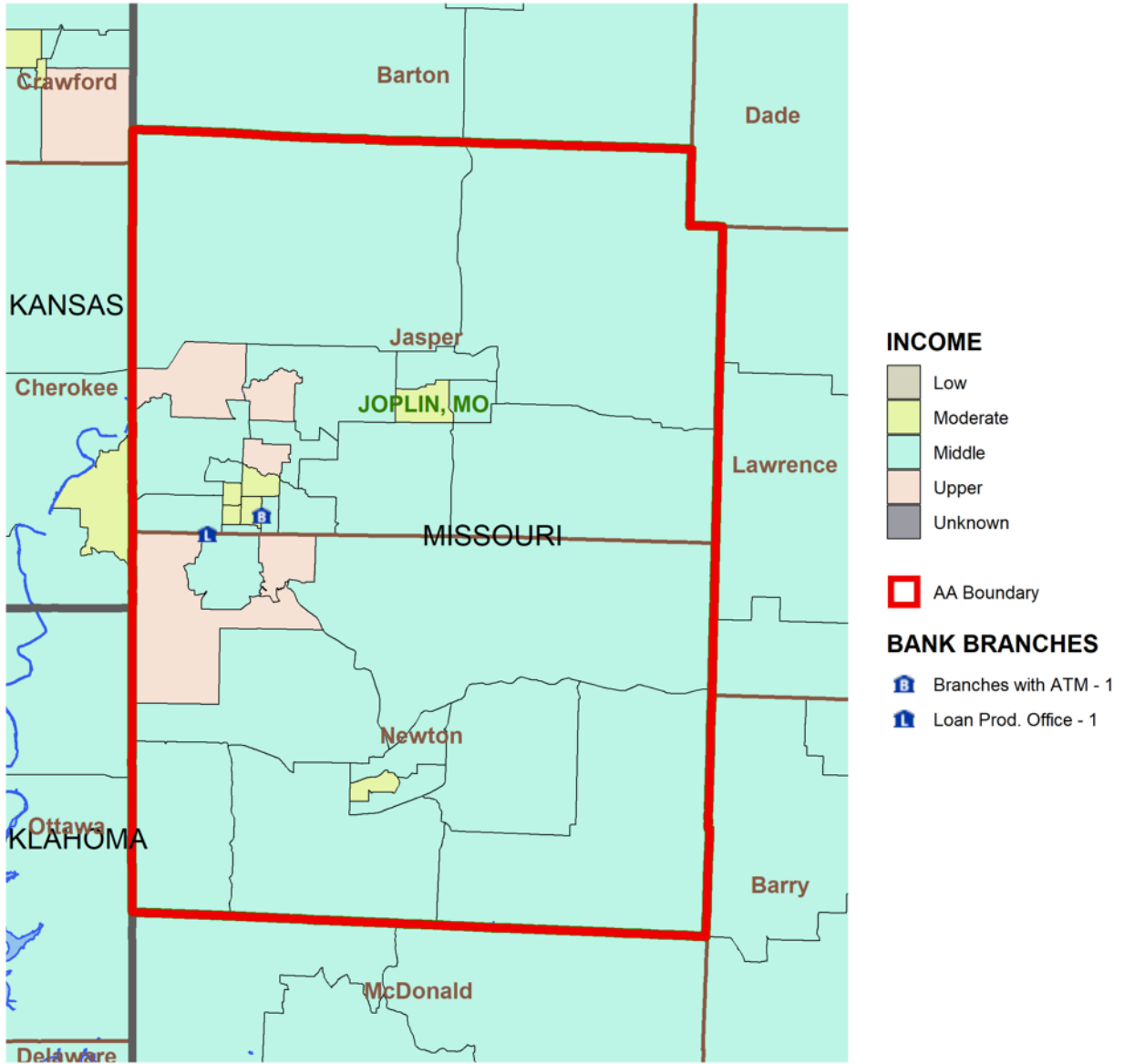
NonMSA MO AA 2020 - Tract Income



ASSESSMENT AREA DETAIL

Oakstar Bk - Springfield MO

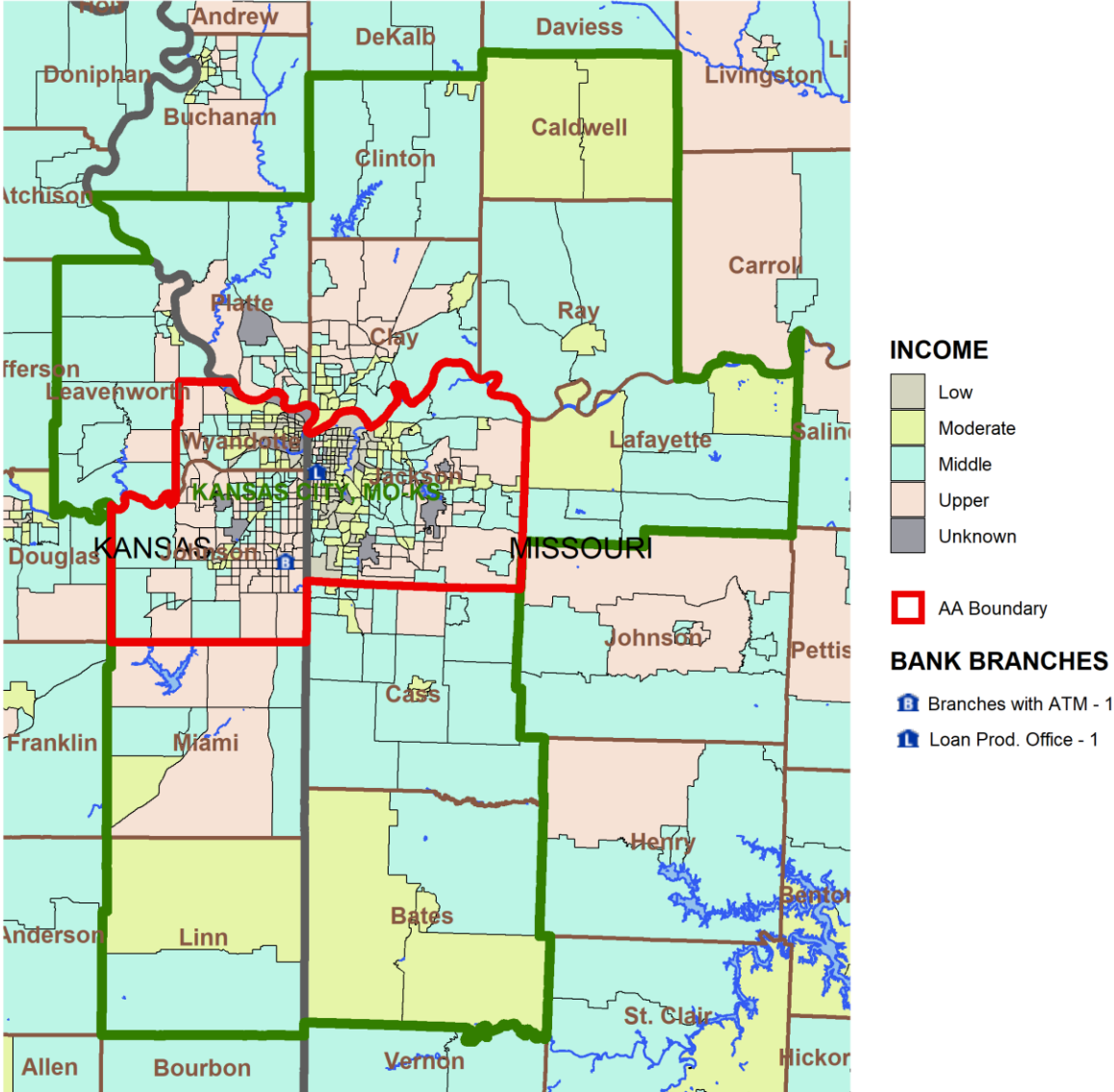
Joplin MO MSA AA 2020 - Tract Income



ASSESSMENT AREA DETAIL

Oakstar Bk - Springfield MO

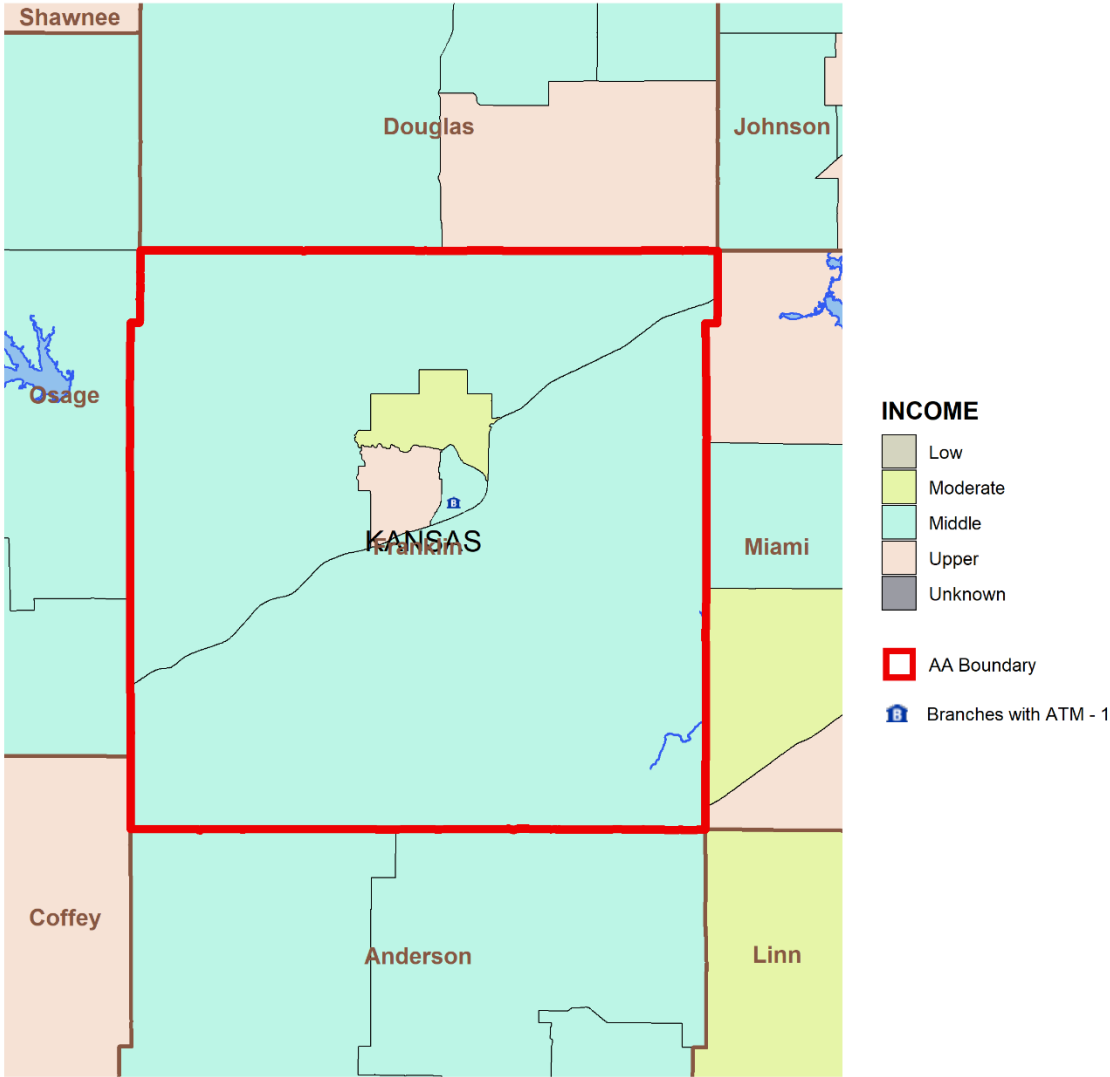
Kansas City MO-KS partial MSA AA 2020 - Tract Income



ASSESSMENT AREA DETAIL

Oakstar Bk - Springfield MO

NonMSA KS AA 2020 - Tract Income



**LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE REVIEW
ASSESSMENT AREAS**

**Missouri
NonMSA Missouri MSA Assessment Area**

Borrower Distribution of Residential Real Estate Loans								
Assessment Area: Western Missouri								
Product Type	Borrower Income Levels	2020						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	1	1.7%	2.5%	124	1.5%	1.0%	19.1%
	Moderate	11	18.3%	8.1%	1,128	13.3%	4.2%	19.3%
	Middle	13	21.7%	13.5%	1,189	14.0%	9.7%	21.0%
	Upper	30	50.0%	63.7%	5,620	66.4%	72.5%	40.6%
	Unknown	5	8.3%	12.2%	405	4.8%	12.5%	0.0%
	TOTAL	60	100.0%	100.0%	8,466	100.0%	100.0%	100.0%
Refinance	Low	7	10.4%	2.2%	390	3.6%	0.9%	19.1%
	Moderate	8	11.9%	5.2%	525	4.8%	2.9%	19.3%
	Middle	16	23.9%	11.4%	1,878	17.2%	7.5%	21.0%
	Upper	32	47.8%	61.3%	6,323	57.8%	67.7%	40.6%
	Unknown	4	6.0%	19.8%	1,819	16.6%	21.1%	0.0%
	TOTAL	67	100.0%	100.0%	10,935	100.0%	100.0%	100.0%
Home Improvement	Low	0	0.0%	4.8%	0	0.0%	3.8%	19.1%
	Moderate	0	0.0%	12.7%	0	0.0%	6.4%	19.3%
	Middle	0	0.0%	12.7%	0	0.0%	5.0%	21.0%
	Upper	1	100.0%	57.1%	47	100.0%	71.9%	40.6%
	Unknown	0	0.0%	12.7%	0	0.0%	12.8%	0.0%
	TOTAL	1	100.0%	100.0%	47	100.0%	100.0%	100.0%
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	19.1%
	Moderate	0	0.0%	5.3%	0	0.0%	1.2%	19.3%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	21.0%
	Upper	1	20.0%	21.1%	576	25.5%	17.3%	40.6%
	Unknown	4	80.0%	73.7%	1,679	74.5%	81.6%	0.0%
	TOTAL	5	100.0%	100.0%	2,255	100.0%	100.0%	100.0%
Other Purpose LOC	Low	0	0.0%	14.3%	0	0.0%	8.0%	19.1%
	Moderate	0	0.0%	8.6%	0	0.0%	8.2%	19.3%
	Middle	0	0.0%	20.0%	0	0.0%	10.4%	21.0%
	Upper	0	0.0%	54.3%	0	0.0%	70.7%	40.6%
	Unknown	0	0.0%	2.9%	0	0.0%	2.7%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%

Other Purpose Closed/Exempt	Low	0	0.0%	3.2%	0	0.0%	1.2%	19.1%
	Moderate	0	0.0%	6.3%	0	0.0%	2.9%	19.3%
	Middle	0	0.0%	19.0%	0	0.0%	10.7%	21.0%
	Upper	0	0.0%	65.1%	0	0.0%	74.6%	40.6%
	Unknown	0	0.0%	6.3%	0	0.0%	10.6%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Purpose Not Applicable	Low	0	0.0%	0.0%	0	0.0%	0.0%	19.1%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	19.3%
	Middle	0	0.0%	1.7%	0	0.0%	0.9%	21.0%
	Upper	0	0.0%	3.4%	0	0.0%	4.9%	40.6%
	Unknown	0	0.0%	94.9%	0	0.0%	94.2%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
HMDA TOTALS	Low	8	5.9%	2.4%	514	2.4%	1.0%	19.1%
	Moderate	19	14.0%	6.7%	1,653	7.6%	3.6%	19.3%
	Middle	31	22.8%	12.5%	3,119	14.3%	8.5%	21.0%
	Upper	65	47.8%	61.8%	12,616	57.9%	69.2%	40.6%
	Unknown	13	9.6%	16.6%	3,903	17.9%	17.8%	0.0%
	TOTAL	136	100.0%	100.0%	21,805	100.0%	100.0%	100.0%

Small Business Loans by Revenue and Loan Size								
Assessment Area: Western Missouri								
Business Revenue and Loan Size		2020						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	(\$ 000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	344	79.1%	43.8%	\$12,359	57.0%	38.3%	92.6%
	Over \$1 Million/Unknown	91	20.9%	56.3%	\$9,328	43.0%	61.7%	7.4%
	TOTAL	435	100.0%	100.0%	\$21,687	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	381	87.6%	88.3%	\$9,795	45.2%	31.9%	
	\$100,001–\$250,000	41	9.4%	6.1%	\$6,546	30.2%	17.4%	
	\$250,001–\$1 Million	13	3.0%	5.6%	\$5,346	24.7%	50.7%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	435	100.0%	100.0%	\$21,687	100.0%	100.0%	
Loan Size	Reve nue	\$100,000 or Less	316	91.9%		\$7,128	57.7%	
		\$100,001–\$250,000	22	6.4%		\$3,479	28.1%	
		\$250,001–\$1 Million	6	1.7%		\$1,752	14.2%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
	TOTAL	344	100.0%		\$12,359	100.0%		

Geographic Distribution of Residential Real Estate Loans								
Assessment Area: Western Missouri								
Product Type	Tract Income Levels	2020						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	11	18.3%	8.2%	1,289	15.2%	5.6%	15.4%
	Middle	45	75.0%	54.0%	6,457	76.3%	47.4%	63.7%
	Upper	4	6.7%	37.8%	720	8.5%	47.0%	20.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	60	100.0%	100.0%	8,466	100.0%	100.0%	100.0%
Refinance	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	5	7.5%	7.4%	506	4.6%	4.7%	15.4%
	Middle	46	68.7%	53.8%	6,345	58.0%	48.5%	63.7%
	Upper	16	23.9%	38.8%	4,084	37.3%	46.8%	20.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	67	100.0%	100.0%	10,935	100.0%	100.0%	100.0%
Home Improvement	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	9.5%	0	0.0%	2.8%	15.4%
	Middle	1	100.0%	52.4%	47	100.0%	58.8%	63.7%
	Upper	0	0.0%	38.1%	0	0.0%	38.4%	20.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	1	100.0%	100.0%	47	100.0%	100.0%	100.0%
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	10.5%	0	0.0%	4.2%	0.1%
	Middle	5	100.0%	73.7%	2,255	100.0%	77.3%	58.8%
	Upper	0	0.0%	10.5%	0	0.0%	6.8%	41.1%
	Unknown	0	0.0%	5.3%	0	0.0%	11.6%	0.0%
	TOTAL	5	100.0%	100.0%	2,255	100.0%	100.0%	100.0%
Other Purpose LOC	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	8.6%	0	0.0%	7.1%	15.4%
	Middle	0	0.0%	60.0%	0	0.0%	51.5%	63.7%
	Upper	0	0.0%	31.4%	0	0.0%	41.4%	20.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Other Purpose Closed/Exempt	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	1	33.3%	17.5%	31	30.4%	10.3%	15.4%
	Middle	1	33.3%	44.4%	50	49.0%	35.2%	63.7%
	Upper	1	33.3%	38.1%	21	20.6%	54.5%	20.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	3	100.0%	100.0%	102	100.0%	100.0%	100.0%

Purpose Not Applicable	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	8.5%	0	0.0%	7.7%	15.4%
	Middle	0	0.0%	78.0%	0	0.0%	74.7%	63.7%
	Upper	0	0.0%	13.6%	0	0.0%	17.5%	20.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
HMDA TOTALS	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	17	12.5%	8.0%	1,826	8.4%	5.2%	15.4%
	Middle	98	72.1%	54.1%	15,154	69.5%	48.5%	63.7%
	Upper	21	15.4%	37.9%	4,825	22.1%	46.2%	20.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.1%	0.0%
	TOTAL	136	100.0%	100.0%	21,805	100.0%	100.0%	100.0%

Geographic Distribution of Small Business Loans							
Assessment Area: Western Missouri							
Tract Income Levels	2020						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	49	11.3%	8.7%	\$1,786	8.2%	7.4%	6.4%
Middle	328	75.4%	68.8%	\$16,755	77.3%	73.6%	69.8%
Upper	58	13.3%	21.8%	\$3,146	14.5%	18.7%	23.7%
Unknown	0	0.0%	0.7%	\$0	0.0%	0.3%	0.0%
TOTAL	435	100.0%	100.0%	\$21,687	100.0%	100.0%	100.0%

Joplin Missouri MSA Assessment Area

Borrower Distribution of Residential Real Estate Loans								
Assessment Area: Joplin, Missouri MSA								
Product Type	Borrower Income Levels	2020						
		Count			Dollar			Families
	Bank		HMDA Aggregate	Bank		HMDA Aggregate		
	#	%	%	\$ (000s)	\$ %	\$ %	%	
Home Purchase	Low	1	5.3%	9.7%	121	4.4%	5.9%	19.9%
	Moderate	2	10.5%	24.5%	244	8.9%	19.5%	18.3%
	Middle	2	10.5%	21.3%	182	6.6%	21.0%	21.2%
	Upper	4	21.1%	28.0%	853	31.1%	38.2%	40.6%
	Unknown	10	52.6%	16.5%	1,347	49.0%	15.4%	0.0%
	TOTAL	19	100.0%	100.0%	2,747	100.0%	100.0%	100.0%

Appendix C (Continued)

Refinance	Low	0	0.0%	5.3%	0	0.0%	2.6%	19.9%
	Moderate	2	13.3%	13.7%	195	7.7%	8.9%	18.3%
	Middle	2	13.3%	18.1%	260	10.2%	15.3%	21.2%
	Upper	8	53.3%	39.3%	1,820	71.6%	48.1%	40.6%
	Unknown	3	20.0%	23.7%	268	10.5%	25.1%	0.0%
	TOTAL	15	100.0%	100.0%	2,543	100.0%	100.0%	100.0%
Home Improvement	Low	0	0.0%	8.9%	0	0.0%	6.6%	19.9%
	Moderate	0	0.0%	15.2%	0	0.0%	9.9%	18.3%
	Middle	0	0.0%	18.4%	0	0.0%	19.3%	21.2%
	Upper	0	0.0%	45.6%	0	0.0%	56.0%	40.6%
	Unknown	2	100.0%	12.0%	398	100.0%	8.2%	0.0%
	TOTAL	2	100.0%	100.0%	398	100.0%	100.0%	100.0%
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	19.9%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	18.3%
	Middle	0	0.0%	5.6%	0	0.0%	1.7%	21.2%
	Upper	0	0.0%	9.7%	0	0.0%	2.6%	40.6%
	Unknown	11	100.0%	84.7%	16,766	100.0%	95.7%	0.0%
	TOTAL	11	100.0%	100.0%	16,766	100.0%	100.0%	100.0%
Other Purpose LOC	Low	0	0.0%	6.4%	0	0.0%	2.2%	19.9%
	Moderate	0	0.0%	6.4%	0	0.0%	2.8%	18.3%
	Middle	0	0.0%	23.4%	0	0.0%	16.2%	21.2%
	Upper	0	0.0%	53.2%	0	0.0%	65.3%	40.6%
	Unknown	0	0.0%	10.6%	0	0.0%	13.5%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Other Purpose Closed/Exempt	Low	0	0.0%	9.9%	0	0.0%	6.0%	19.9%
	Moderate	0	0.0%	18.7%	0	0.0%	12.6%	18.3%
	Middle	0	0.0%	24.2%	0	0.0%	24.0%	21.2%
	Upper	0	0.0%	39.6%	0	0.0%	48.5%	40.6%
	Unknown	0	0.0%	7.7%	0	0.0%	9.0%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Purpose Not Applicable	Low	0	0.0%	0.0%	0	0.0%	0.0%	19.9%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	18.3%
	Middle	0	0.0%	0.6%	0	0.0%	1.0%	21.2%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	40.6%
	Unknown	0	0.0%	99.4%	0	0.0%	99.0%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
HMDA TOTALS	Low	1	2.1%	7.5%	121	0.5%	4.1%	19.9%
	Moderate	4	8.5%	18.8%	439	2.0%	13.5%	18.3%
	Middle	4	8.5%	19.3%	442	2.0%	17.3%	21.2%
	Upper	12	25.5%	32.6%	2,673	11.9%	40.4%	40.6%
	Unknown	26	55.3%	21.8%	18,779	83.6%	24.8%	0.0%
	TOTAL	47	100.0%	100.0%	22,454	100.0%	100.0%	100.0%

Small Business Loans by Revenue and Loan Size								
Assessment Area: Joplin, Missouri MSA								
Business Revenue and Loan Size		2020						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	77	55.0%	34.2%	\$5,622	32.4%	26.7%	91.2%
	Over \$1 Million/ Unknown	63	45.0%	65.8%	\$11,715	67.6%	73.3%	8.8%
	TOTAL	140	100.0%	100.0%	\$17,337	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	90	64.3%	86.4%	\$2,869	16.5%	28.5%	
	\$100,001– \$250,000	27	19.3%	7.9%	\$4,537	26.2%	22.0%	
	\$250,001–\$1 Million	23	16.4%	5.8%	\$9,931	57.3%	49.4%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	140	100.0%	100.0%	\$17,337	100.0%	100.0%	
Loan Size	R ev	\$100,000 or Less	63	81.8%		\$1,625	28.9%	
		\$100,001–\$250,000	7	9.1%		\$1,166	20.7%	
		\$250,001–\$1 Million	7	9.1%		\$2,831	50.4%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		TOTAL	77	100.0%		\$5,622	100.0%	

Geographic Distribution of Residential Real Estate Loans								
Assessment Area: Joplin, Missouri MSA								
Product Type	Tract Income Levels	2020						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	5	26.3%	12.8%	521	19.0%	8.7%	10.7%
	Middle	10	52.6%	65.9%	1,403	51.1%	67.3%	71.0%
	Upper	4	21.1%	21.3%	823	30.0%	24.0%	18.3%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	19	100.0%	100.0%	2,747	100.0%	100.0%	100.0%
Refinance	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	3	20.0%	6.5%	280	11.0%	4.5%	10.7%
	Middle	9	60.0%	70.9%	1,510	59.4%	70.4%	71.0%
	Upper	3	20.0%	22.5%	753	29.6%	25.1%	18.3%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	15	100.0%	100.0%	2,543	100.0%	100.0%	100.0%
Home Improvement	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	2	100.0%	17.7%	398	100.0%	11.4%	10.7%
	Middle	0	0.0%	62.0%	0	0.0%	69.6%	71.0%
	Upper	0	0.0%	20.3%	0	0.0%	19.0%	18.3%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	2	100.0%	100.0%	398	100.0%	100.0%	100.0%

Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	7	63.6%	41.7%	3,261	19.5%	36.5%	31.7%
	Middle	3	27.3%	45.8%	7,980	47.6%	45.5%	58.9%
	Upper	1	9.1%	12.5%	5,525	33.0%	18.0%	9.4%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	11	100.0%	100.0%	16,766	100.0%	100.0%	100.0%
Other Purpose LOC	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	6.4%	0	0.0%	5.6%	10.7%
	Middle	0	0.0%	61.7%	0	0.0%	61.8%	71.0%
	Upper	0	0.0%	31.9%	0	0.0%	32.7%	18.3%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Other Purpose Closed/Exempt	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	5.5%	0	0.0%	2.3%	10.7%
	Middle	0	0.0%	70.3%	0	0.0%	66.6%	71.0%
	Upper	0	0.0%	24.2%	0	0.0%	31.0%	18.3%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Purpose Not Applicable	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	18.1%	0	0.0%	12.9%	10.7%
	Middle	0	0.0%	57.6%	0	0.0%	59.4%	71.0%
	Upper	0	0.0%	24.3%	0	0.0%	27.7%	18.3%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
HMDA TOTALS	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	17	36.2%	10.5%	4,460	19.9%	8.4%	10.7%
	Middle	22	46.8%	67.6%	10,893	48.5%	67.4%	71.0%
	Upper	8	17.0%	21.9%	7,101	31.6%	24.2%	18.3%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	47	100.0%	100.0%	22,454	100.0%	100.0%	100.0%

Geographic Distribution of Small Business Loans							
Assessment Area: Joplin, Missouri MSA							
Tract Income Levels	2020						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	14	10.0%	17.0%	\$1,044	6.0%	18.7%	18.9%
Middle	88	62.9%	69.7%	\$13,404	77.3%	67.3%	67.8%
Upper	38	27.1%	12.8%	\$2,889	16.7%	13.7%	13.3%
Unknown	0	0.0%	0.4%	\$0	0.0%	0.2%	0.0%
TOTAL	140	100.0%	100.0%	\$17,337	100.0%	100.0%	100.0%

GLOSSARY

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

Assessment area: One or more of the geographic areas delineated by the bank and used by the regulatory agency to assess an institution's record of CRA performance.

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

Community contact: Interviews conducted as part of the CRA examination to gather information that might assist examiners in understanding the bank's community, available opportunities for helping to meet local credit and community development needs, and perceptions on the performance of financial institutions in helping meet local credit needs. Communications and information gathered can help to provide a context to assist in the evaluation of an institution's CRA performance.

Community development: An activity associated with one of the following five descriptions: (1) affordable housing (including multifamily rental housing) for low- or moderate-income individuals; (2) community services targeted to low- or 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; (4) activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies; or (5) Neighborhood Stabilization Program (NSP) eligible activities in areas with HUD-approved NSP plans, which are conducted within two years after the date when NSP program funds are required to be spent and benefit low-, moderate-, and middle-income individuals and geographies.

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

Demographics: The statistical characteristics of human populations (e.g., age, race, sex, and income) used especially to identify markets.

Distressed nonmetropolitan middle-income geography: A middle-income, nonmetropolitan geography will be designated as distressed if it is in a county that meets one or more of the following triggers: (1) an unemployment rate of at least 1.5 times the national average, (2) a poverty rate of 20 percent or more, or (3) a population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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

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

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

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

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes, and refinancing of home improvement and home purchase loans.

Household: One or more persons who occupy a housing unit. The occupants may be a single family, one person living alone, two or more families living together, or any other group of related or unrelated persons who share living arrangements.

Housing affordability ratio: Calculated by dividing the median household income by the median housing value. It represents the amount of single family, owner-occupied housing that a dollar of income can purchase for the median household in the census tract. Values closer to 100 percent indicate greater affordability.

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

Appendix D (continued)

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

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

Median family income: The dollar amount that divides the family income distribution into two equal groups, half having incomes above the median, half having incomes below the median. The median family income is based on all families within the area being analyzed.

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. An 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. An MD is a division of an MSA based on specific criteria including commuting patterns. Only an MSA that has a population of at least 2.5 million may be divided into MDs.

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

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

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

Nonmetropolitan statistical area (nonMSA): Not part of a metropolitan area. (See metropolitan area.)

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

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

Performance context: The performance context is a broad range of economic, demographic, and institution- and community-specific information that an examiner reviews to understand the context in which an institution's record of performance should be evaluated. The performance context is not a formal or written assessment of community credit needs.

Appendix D (continued)

Performance criteria: These are the different criteria against which a bank's performance in helping to meet the credit needs of its assessment area(s) is measured. The criteria relate to lending, investment, retail service, and community development activities performed by a bank. The performance criteria have both quantitative and qualitative aspects. There are different sets of criteria for large banks, intermediate small banks, small banks, wholesale/limited purpose banks, and strategic plan banks.

Performance evaluation (PE): A written evaluation of a financial institution's record of meeting the credit needs of its community, as prepared by the federal financial supervision agency responsible for supervising the institution.

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

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

Small businesses/small farms: A small business/farm is considered to be one in which gross annual revenues for the preceding calendar year were \$1 million or less.

Small loan(s) to business(es): That is, "small business loans" are included in "loans to small businesses" as defined in the Consolidated Reports of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are secured either by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

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

Underserved middle-income geography: A middle-income, nonmetropolitan geography will be designated as underserved if it meets criteria for population size, density, and dispersion that indicate the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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