

# Glacier Bank Branch File



**2024**


**Includes:**

**Hours and Locations 02/2024**

**Products and Services 02/2024**

**Current Fees Schedule as of 01/01/2024**

**2022 Community Reinvestment Act Performance Evaluation**

<div>  <div>GLACIER BANK LOCATIONS, GEOGRAPHIES &amp; HOURS OF OPERATION UPDATED 02-27-2024</div> </div>													
Division	Office Name	FDIC Service Type	Address	County	City	State	Zip	MSA	State Code	County Code	Census Tract	Branch/Office Hours of Operation	Drive Up Hours of Operation
Glacier Bank	Glacier Bank - Anaconda Office	11	307 E Park St	Deer Lodge	Anaconda	MT	59711	99999	30	23	0003.00	Mon-Fri: 9:00 am - 4:00 pm	Mon-Fri: 8:00 am - 6:00 pm; Sat: 9:00 am - 1:00 pm
Glacier Bank	Glacier Bank - Kalispell Main	11	202 S. Main Street	Flathead	Kalispell	MT	59901	99999	30	29	0010.00	Mon-Fri: 9:00 am - 4:00 pm	N/A
Glacier Bank	Glacier Bank - Center St Drive Up Branch	23	135 Center Street	Flathead	Kalispell	MT	59901	99999	30	29	0010.00	N/A	Mon-Fri: 8:00 am - 6:00 pm; Saturday 9:00 am - 1:00 pm
Glacier Bank	Glacier Bank - Buffalo Hill Branch	11	49 Commons Loop	Flathead	Kalispell	MT	59901	99999	30	29	0009.03	Mon-Fri: 9:00 am - 4:00 pm	Mon-Fri: 8:00 am - 6:00 pm; Sat: 9:00 am - 1:00 pm
Glacier Bank	Glacier Bank - West Reserve Office Branch	11	490 West Reserve Drive	Flathead	Kalispell	MT	59901	99999	30	29	0008.01	Mon-Fri: 9:00 am - 4:00 pm	Mon-Fri: 8:00 am - 6:00 pm; Sat: 9:00 am - 1:00 pm
Glacier Bank	Glacier Bank - Evergreen Office	11	2199 Highway 2 East	Flathead	Kalispell	MT	59901	99999	30	29	0007.00	Mon-Fri: 9:00 am - 4:00 pm	Mon-Fri: 8:00 am - 6:00 pm; Sat: 9:00 am - 1:00 pm
Glacier Bank	Glacier Bank - Lakeside Branch	11	7100 Highway 93 S Suite B	Flathead	Lakeside	MT	59922	99999	30	29	0014.02	Mon-Fri: 9:00 am - 4:00 pm	Sat: 9:00 am - 1:00 pm
Glacier Bank	Glacier Bank Of Whitefish Branch	11	319 East 2nd Street	Flathead	Whitefish	MT	59937	99999	30	29	0004.02	Mon-Fri: 9:00 am - 4:00 pm	Mon-Fri: 8:00 a.m. - 5:30 p.m. Mon-Fri: 8:00 am - 5:30 pm
Glacier Bank	Glacier Bank - Whitefish South Branch	11	6195 Highway 93 South	Flathead	Whitefish	MT	59937	99999	30	29	0001.01	Mon-Fri: 9:00 am - 4:00 pm	Sat: 9:00 am - 1:00 pm
Glacier Bank	Glacier Bank - Columbia Falls Office	11	822 Nucleus Avenue	Flathead	Columbia Falls	MT	59912	99999	30	29	0002.03	Mon-Fri: 9:00 am - 4:00 pm	Mon-Fri: 9:00 am - 5:30 pm; Sat: 9:00 am - 1:00 pm
Glacier Bank	Glacier Bank - Bigfork Office	11	8251 Highway 35	Flathead	Bigfork	MT	59911	99999	30	29	0013.03	Mon-Fri: 9:00 am - 4:00 pm	Mon-Fri: 8:00 am - 6:00 pm; Sat: 9:00 am - 1:00 pm
Glacier Bank	Glacier Bank Operations Center (GboC)	21	2240 Us Highway 93 South	Flathead	Kalispell	MT	59901	99999	30	29	0012.01	NON PUBLIC	N/A
Glacier Bank	Glacier Bank - Polson Branch	11	50510 Us Highway 93	Lake	Polson	MT	59860	99999	30	47	9403.04	Mon-Fri: 9:00 am - 4:00 pm	Mon-Fri: 8:00 a.m. - 6:00 pm
Glacier Bank	Glacier Bank Polson Detached Drive-Up	23	402 Main Street	Lake	Polson	MT	59860	99999	30	47	9403.07	Mon-Fri: 8:00 am - 6:00 pm; 9:00 am - 1:00 pm Saturday	Mon-Fri: 8:00 am - 6:00 pm; 9:00 am - 1:00 pm Saturday
Glacier Bank	Glacier Bank - Ronan Branch	11	63239 Us Highway 93	Lake	Ronan	MT	59864	99999	30	47	9405.00	Mon-Fri: 9:00 am - 4:00 pm	Mon-Fri: 8:00 a.m. - 6:00 pm , Sat 9:00 am - 1:00 pm
Glacier Bank	Glacier Bank - Harvest Foods Branch	23	63802 Us Hwy 93	Lake	Ronan	MT	59864	99999	30	47	9405.00	Mon-Fri: 9:00 am - 4:30 pm	No Drive up at this location
Glacier Bank	Glacier Bank - Libby	11	615 California Avenue	Lincoln	Libby	MT	59923	99999	30	53	0002.00	Mon-Fri: 9:00 am - 4:00 pm	Mon-Fri: 8:00 am - 6:00 pm; Sat: 9:00 am - 1:00 pm
Glacier Bank	Glacier Bank - Eureka Office	11	222 Dewey Avenue	Lincoln	Eureka	MT	59917	99999	30	53	0004.02	Mon-Fri: 9:00 am - 4:00 pm	Mon-Fri: 8:00 am - 6:00 pm; Sat: 9:00 am - 1:00 pm
Glacier Bank	Glacier Bank - Butte Tamarack Office	11	3701 Harrison Avenue	Silver Bow	Butte	MT	59701	99999	30	93	0006.00	Mon-Fri: 9:00 am - 4:00 pm	Mon-Fri: 8:00 am - 6:00 pm
Glacier Bank	Glacier Bank Butte- Harrison Branch	11	1880 Harrison Avenue	Silver Bow	Butte	MT	59702	99999	30	93	0004.00	Mon-Fri: 9:00 am - 4:00 pm	Mon-Fri 8:00 a.m - 6:00 p.m. Sat. 9:00 a.m. - 1:00 p.m.

## **Deposit Services, Lending Products and Other Services of Glacier Bank** updated 02.2024

Glacier Bank offers a free checking account product for consumers and businesses along with other checking products. Savings accounts, money market deposit accounts, certificates of deposit, individual retirement accounts, and health savings accounts are also offered at this division.

### **Glacier Bank Savings and Checking Products**

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Totally Free Checking	Totally Free Business Checking
50+ Interest Checking	Business Analysis Checking
Easy Interest Checking	Business Savings
Premier Interest Checking	Business Money Market Account
Savings	
Money Market Account	
Attorney Trust Account	

### **Consumer Credit Services of Glacier Bank\***

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Glacier Bank offers many types of consumer loans.

Vehicle/Motorcycle/ATV Loans	Boat/RV/Snowmobile Loans
Unsecured Loans & Lines of Credit	Home Equity Lines of Credit (HELOCs)
Certificates of Deposit Secured Loans/Lines of Credit	Credit Builder Loans
Overdraft Protection Lines of Credit	Visa Credit Cards through First Nat'l Bank of Omaha

### **Glacier Bank Real Estate Products\***

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Glacier Bank offers a wide variety of real estate mortgage loans.

Home Purchases	Home Refinances
Portfolio Loans	Conventional Loans
VA Loans	FHA Loans
Construction Loans	USDA Loans
Construction/Perm Loans	Land & Lot Loans
Montana Board of Housing Loans	First Time Home Buyer Loans
Mobile Home Loans	
NeighborWorks Montana	

\*We offer innovative and flexible lending programs targeted to low-and-moderate income individuals that help us serve the credit needs of all in our assessment area.

### **Commercial Credit Services of Glacier Bank**

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Commercial loans and lines of credit are offered for commercial endeavors.

Commercial Real Estate Loans	SBA 7(a) Loan Programs
Commercial Real Estate Construction Loans	SBA 504 Loan
Secured and Unsecured Lines of Credit	Agriculture Loans
Commercial Vehicle Loans	USDA Guaranteed Loans
Equipment Loans	Letters of Credit
C&I Loans	Lot Development Loans and Lines of Credit
Visa® Business Card	MOFI – Montana Community Development Corp

### **Other Services of Glacier Bank**

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Glacier Bank offers online banking including Mobile Check Deposit, Bill Pay and eStatements for consumers and businesses. 24-hour Telephone Banking is available, as well a mobile banking app and night drop services. Treasury management services are offered for business customers. Glacier Bank partners with Heartland for Merchant Payment Processing. Safe deposit boxes are available at most offices, along with services such as wire transfers, cashier's checks and ATMs. Visa Debit Cards are offered for Glacier Bank personal and business checking accounts, and ATM cards can be used with savings accounts.

## FEE SCHEDULE EFFECTIVE JANUARY 1, 2024

### **Overdraft Fees:**

Overdraft created by items or transactions including, but not limited to, checks (including re-presented checks), ACH (including ACH transactions initiated after a first ACH is returned), in-person withdrawals, ATM withdrawals, or other withdrawals or transfers by electronic or other means (collectively "item").

Overdraft Fee..... \$30.00  
- fee assessed for each item paid<sup>1</sup>

Continuous Overdraft Fee..... \$5.00  
- fee assessed each day accounts that remain overdrawn for more than 5 consecutive business days

### **Wire Transfer Fees:**

Domestic Wire Transfer Fee (the following fees will be disclosed as "Domestic Wire Transfer Fee" on your periodic statement)

- for each incoming wire transfer ..... \$10.00  
- for each outgoing wire transfer..... \$20.00

Foreign Wire Transfer Fee (the following fees will be disclosed as "Foreign Wire Transfer Fee" on your periodic statement)

- for each incoming wire transfer..... \$10.00  
- for each outgoing wire transfer sent in US dollars..... \$75.00  
- for each outgoing wire transfer sent in foreign currency..... \$50.00

### **Card Services:**

Debit Card Express Delivery..... \$80.00

Debit Card Local Image Fee..... \$5.00

Debit Card Custom Image Fee..... \$10.00

### **Other Fees:**

Cashiers Check Fee per check..... \$5.00

Early Closing Fee..... \$10.00  
- if account is closed within the first 90 days

Levy/Garnishment Fee per request..... \$75.00

Excess Debit Fee per item..... \$1.00

Stop Payment Fee each item..... \$30.00

Sweep Transaction Fee each transfer..... \$2.00

Unclaimed Property Fee.....Varies by state

Products and services may vary by branch. Not all fees are listed. Unclaimed property fees are based on state escheatment laws. Fees are subject to change at the bank's discretion. Contact your local branch if you have questions.

<sup>1</sup> No Overdraft Fee will be charged for debit card transaction requests and ATM withdrawals that were pre-authorized with a positive current balance and post with a negative current balance.

# **PUBLIC DISCLOSURE**

July 20, 2022

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Glacier Bank  
Certificate Number: 30788

49 Commons Loop  
Kalispell, Montana 59901

Federal Deposit Insurance Corporation  
Division of Depositor and Consumer Protection  
San Francisco Regional Office

25 Jessie Street at Ecker Square, Suite 2300  
San Francisco, California 94105

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 this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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## INSTITUTION RATING

**INSTITUTION'S CRA RATING:** This institution is rated **Satisfactory**.

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

PERFORMANCE LEVELS	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding		X	
High Satisfactory	X		X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			
<i>*The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.</i>			

**The Lending Test is rated High Satisfactory.**

Lending levels reflect good responsiveness to AA credit needs. A high percentage of loans are made within the bank's AAs. The geographic distribution reflect adequate penetration throughout the AAs. The distribution of borrowers reflects good penetration among retail customers of different income levels and businesses and farms of different sizes. The bank exhibits a good record of serving the credit needs of highly economically disadvantaged areas of the AA, low-income individuals, and very small businesses and farms, consistent with safe and sound banking practices. The bank is a leader in making community development (CD) loans. The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs.

**The Investment Test is rated Outstanding.**

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

**The Service Test is rated High Satisfactory.**

Delivery systems are accessible to essentially all portions of the bank's AAs. To the extent changes have been made, the bank's record of opening and closing of branches has improved the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank's services (including, where appropriate, business hours) do not vary in a way that inconveniences its assessment area(s), particularly low- and moderate-income individuals. The bank provides a relatively high level of CD services.



## DESCRIPTION OF INSTITUTION

Glacier Bank (GB) is a state-chartered institution headquartered in Kalispell, Montana. The institution is owned by Glacier Bancorp, Inc. (GBCI). GB does not have any lending-related or CRA-relevant subsidiaries or affiliates; thus, all lending activity including in this evaluation is provided directly by the institution. GB received a “Satisfactory” rating at the May 13, 2019, FDIC CRA Performance Evaluation (PE), performed using Interagency Large Institution Examination Procedures.

GB operates an extensive branch network with 191 offices located throughout eight states. GB’s operational structure is unique, in that acquired institutions retain their names and management teams, operating as individual divisions supported by the shared resources of GB’s network. Therefore, in addition to branches operated in Montana under the Glacier brand, GB also operates in Montana as First Security Bank, Valley Bank, First Bank of Montana, Western Security Bank, and First Security Bank. Also, GB operates in Idaho, Washington, and Utah as Mountain West Bank; in Wyoming and Utah as First Bank; as Citizens Community Bank in Idaho; as North Cascades Bank in Washington; as First State Bank in Wyoming; as Bank of the San Juans and Collegiate Peaks Bank in Colorado; as Foothills Bank and State Bank of Arizona in Arizona; as Heritage Bank of Nevada in Nevada; and as First Community Bank and Altabank in Utah.

During the review period, the bank opened 41 branches and closed 3 branches. The majority of branch openings were the result of acquisition activity: GB acquired First Community Bank in May 2019, Heritage Bank of Nevada in August 2019, State Bank of Arizona in March 2020, and Altabank in October 2021.

While the bank remains primarily focused on commercial lending, GB also offers a broad range of personal and business lending products, including agricultural and consumer loans, and a traditional array of personal and business deposit products and services, including online, mobile, and telephone banking; remote deposit services; person-to-person payments; business payroll; and cash management services to enable businesses to securely manage cash flow. The bank also issues automated teller machine (ATM) cards and debit cards that can be used to access customer accounts through a system of owned and branded ATMs.

GB’s assets totaled \$26.1 billion and deposits totaled \$21.8 billion as of March 31, 2022. The bank’s loans totaled \$13.8 billion and securities totaled \$10.1 billion for the same time period. The following table illustrates the loan portfolio:

<b>Loan Portfolio Distribution</b>		
<b>Loan Category</b>	<b>\$(000s)</b>	<b>%</b>
Construction, Land Development, and Other Land Loans	1,971,890	14.3%
Secured by Farmland	492,515	3.6%
Secured by 1-4 Family Residential Properties	2,253,079	16.3%
Secured by Multi-family (5 or more) Residential Properties	545,483	4.0%
Secured by Non-farm Non-Residential Properties	5,866,200	42.6%
<b>Total Real Estate Loans</b>	11,129,167	80.7%
Commercial and Industrial Loans	1,378,500	10.0%
Agricultural Production and Other Loans to Farmers	238,733	1.7%
Consumer	207,827	1.5%
Obligations of States and Political Subdivisions in the United States	659,742	4.8%
Other Loans	101,508	0.7%
Lease Financing Receivables (net of unearned income)	66,826	0.5%
Less: Unearned Income	-	-
<b>Total Loans</b>	<b>13,782,303</b>	<b>100.0%</b>
<i>Source: Reports of Condition and Income as of 3/31/2022</i>		

Examiners did not identify any financial, legal, or other impediments that affect the bank's ability to meet the credit needs of its AAs.

## DESCRIPTION OF ASSESSMENT AREAS

GB delineated 28 AAs throughout 8 states. Overall there are eight rated areas within this evaluation. The following table summarizes GB's rated areas, AAs, and review procedures used for each.

<b>RATED AREA/ASSESSMENT AREA</b>	<b>REVIEW PROCEDURES</b>
<b>Montana:</b> Montana Non-MSA Billings Great Falls Missoula	Full-scope Limited-scope Limited-scope Limited scope
<b>Idaho:</b> Coeur d'Alene Boise City Idaho Falls-Rexburg-Blackfoot Pocatello Idaho Non-MSA	Full-scope Limited-scope Limited-scope Limited-scope Limited-scope
<b>Wyoming:</b> Wyoming Non-MSA Casper	Full-scope Limited-scope
<b>Colorado:</b> Colorado Non-MSA Colorado Springs Denver-Aurora Grand Junction Pueblo-Canon City	Full-scope Limited-scope Limited-scope Limited-scope Limited-scope
<b>Arizona:</b> Prescott Flagstaff Lake Havasu City-Kingman Phoenix-Mesa-Scottsdale Tucson Yuma	Full-scope Limited-scope Limited-scope Limited-scope Limited-scope Limited-scope
<b>Washington</b> Spokane Wenatchee Washington Non-MSA	Full-scope Limited-scope Limited-scope
<b>Nevada:</b> Reno-Carson City-Fernley	Full-scope
<b>Utah:</b> Ogden-Clearfield Salt Lake City-Provo-Orem	Full-scope Limited-scope
<i>*No analysis conducted. Review was limited to reported CD activity only.</i>	

The State of Nevada was delineated in 2020, and represents a new rated area since the previous evaluation. In 2022, GB delineated the Logan UT-ID Multistate MSA, which would also be a new rated area; however, due to the late entry into the review period, the area is not included in this evaluation other than for purposes of noting any applicable CD activities that occurred since its' addition. Refer to the individual rated area and AA sections for details regarding applicable changes to the AA, as well as demographic and economic information.

## SCOPE OF EVALUATION

### **General Information**

Examiners used the Interagency Large Institution Examination Procedures to evaluate GB's CRA performance. This evaluation covers the period from the prior evaluation, dated May 13, 2019, to the current evaluation dated July 18, 2022.

Based on the volume of loans, deposits, and branches, the State of Montana carried the most weight in determining the overall CRA Rating. Examiners weighted the remaining rated areas in the same manner. The following table presents the rated areas in the order in which they are presented throughout this evaluation.

<b>Rated Area Breakdown of Loans, Deposits, and Branches</b>						
<b>Rated Area</b>	<b>Loans</b>		<b>Deposits</b>		<b>Branches*</b>	
	<b>\$(000s)</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>	<b>#</b>	<b>%</b>
Montana	5,295,778	42.9	7,206,605	42.7	63	33.0
Idaho	2,756,791	22.4	2,408,791	14.3	22	11.5
Wyoming	921,515	7.5	1,399,304	8.3	17	8.9
Colorado	988,971	8.0	1,832,352	10.8	25	13.1
Arizona	895,982	7.3	1,454,054	8.6	15	7.8
Washington	807,891	6.5	898,509	5.3	13	6.8
Nevada	296,171	2.4	1,021,539	6.0	7	3.7
Utah	368,897	3.0	667,291	4.0	29	15.2
<b>Total</b>	<b>12,331,996</b>	<b>100.0</b>	<b>16,888,445</b>	<b>100.0</b>	<b>191</b>	<b>100.0</b>
<i>Source: Bank Data; FDIC Summary of Deposits (6/30/2021)</i>						
<i>*Includes all licensed deposit-taking branch offices.</i>						

### **Activities Reviewed**

Examiners determined that the bank's major product lines include home mortgage, small business, and small farm loans. This conclusion considered the bank's business strategy, loan composition, and the number and dollar volume of loans originated during the evaluation period. GB did not request the inclusion of consumer loans as part of this evaluation; therefore, consumer loans were excluded from review.

For the Lending Test, examiners reviewed the universe of home mortgage, small business, and small farm loans originated in 2019, 2020, and 2021. Based on the larger volume of home mortgage and small business loan originations, examiners placed more weight on GB's performance for these two products when arriving at overall conclusions. Although examiners analyzed small farm lending in all AAs, the presentation of conclusions for these analyses was limited to the AAs where there was a substantial presence of such lending. The following table details the loans included in the scope of the evaluation.

Loan Products Reviewed						
Loan Category	Universe		Reviewed		Presented	
	#	\$(000s)	#	\$(000s)	#	\$(000s)
Home Mortgage	31,603	8,549,583	31,603	8,549,583	31,603	8,549,583
Small Business	38,877	4,324,549	38,877	4,324,549	38,877	4,324,549
Small Farm	7,086	649,136	7,086	649,136	7,086	649,136
<i>Source: HMDA LARs and CRA LRs from 2019, 2020, and 2021</i>						

Examiners used 2019 and 2020 HMDA aggregate data, 2015 American Community Service (ACS) Census data, 2019 and 2020 CRA aggregate data, and 2019 and 2020 D&B demographic data as comparison's for the bank's lending performance. Aggregate data for 2021 was not available at the time of this evaluation. Tables presenting GB's geographic distribution and borrower profile performance are include in the Appendices.

The evaluation of CD loans, investments, and services included all qualified activities since the previous evaluation dated May 13, 2019, through July 20, 2022. Examiners evaluated GB's CD activities quantitatively based on the bank's financial capacity, as well as qualitatively based upon the impact of those activities on GB's AAs.

The evaluation of CD investments also includes prior period investments still outstanding at the time of this evaluation. The Service Test includes review of: delivery systems for providing retail banking services, including branches and alternative delivery systems; the impact of branch openings and closings during the evaluation period; and review of retail banking products and services targeted toward LMI individuals or small businesses and/or tailored to meet specific needs within the AAs.

## CONCLUSIONS ON PERFORMANCE CRITERIA

### LENDING TEST

The Lending Test is rated "High Satisfactory." The bank's performance was consistent in each rated area with the exception of Washington, where the performance was below the overall performance conclusion.

#### Lending Activity

GB's lending levels reflect good responsiveness to AA credit needs. The bank's performance varied somewhat by AA. Refer to each respective analysis for details.

#### Assessment Area Concentration

GB made a high percentage of loans in the bank's AAs. This conclusion is based on a high percentage of home mortgage, small business, and small farm loans originated within the AAs by both number and dollar volume. Refer to the following table.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2019	7,723	94.8	427	5.2	8,150	1,751,754	93.5	122,638	6.5	1,874,393
2020	11,646	95.3	575	4.7	12,221	3,007,656	95.6	138,921	4.4	3,146,576
2021	9,949	88.6	1,283	11.4	11,232	3,113,980	88.2	414,634	11.8	3,528,614
Subtotal	29,318	92.8	2,285	7.2	31,603	7,873,390	92.1	676,193	7.9	8,549,583
Small Business										
2019	4,992	93.7	335	6.3	5,327	732,708	91.7	66,344	8.3	799,052
2020	19,520	94.3	1,186	5.7	20,706	1,897,965	92.2	159,746	7.8	2,057,711
2021	12,034	93.7	810	6.3	12,844	1,351,199	92.1	116,587	7.9	1,467,786
Subtotal	36,546	94.0	2,331	6.0	38,877	3,981,872	92.1	342,677	7.9	4,324,549
Small Farm										
2019	1,484	84.2	278	15.8	1,762	161,651	82.6	33,954	17.4	195,605
2020	1,867	84.5	343	15.5	2,210	181,454	81.8	40,357	18.2	221,811
2021	2,732	87.7	382	12.3	3,114	197,614	85.3	34,106	14.7	231,720
Subtotal	6,083	85.8	1,003	14.2	7,086	540,719	83.3	108,417	16.7	649,136
Source: Bank Data Due to rounding, totals may not equal 100.0%										

### **Geographic Distribution**

GB's geographic distribution of loans reflects adequate penetration throughout the AAs. The bank's performance was consistent in each rated area with the exception of Wyoming, Arizona, and Nevada where the performance was above the overall performance conclusion. Refer to each respective analysis for details.

### **Borrower Profile**

GB's distribution of borrowers reflects good penetration among retail customers of different income levels and businesses and farms of different sizes. The bank's performance was consistent in each rated area with the exception of Idaho, Washington, and Nevada where the performance was below the overall performance conclusion.

### **Innovative or Flexible Lending Practices**

GB makes extensive use of innovative or flexible lending practices in order to serve AA credit needs. GB participated in 28,885 flexible or innovative loans totaling over \$3.7 billion during the review period. This represents a substantial increase by dollar volume over the last examination, where GB's innovative and flexible loans totaled approximately \$1.1 billion. The following tables detail GB's innovative and flexible lending programs over the review period. The programs and

products are only presented in this section and are not presented separately within each rated area or AA analysis.

<b>Innovative or Flexible Lending – National Programs</b>										
<b>Type of Program</b>	<b>2019</b>		<b>2020</b>		<b>2021</b>		<b>2022</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
FHA Loans	126	26,624	267	59,820	196	45,277	48	13,314	637	145,035
VA Loans	115	31,717	259	81,291	246	86,619	46	17,815	666	217,442
USDA Loans	73	12,338	191	37,956	94	18,540	14	2,925	372	71,759
SBA Loans	248	182,553	232	141,241	357	379,044	73	80,912	910	783,750
FannieMac Loans	13	2,302	22	4,442	10	1,796	1	202	46	8,742
FreddieMac Loans	1	159	3	575	0	0	0	0	4	734
FSA Loans	7	49,094	23	6,578	24	9,147	5	1,785	59	66,604
FHLB Loans	2	12	2	15	1	160	0	0	5	187
PPP	0	0	16,119	1,475,577	8,531	568,504	0	0	24,650	2,044,081
<b>Total</b>	<b>585</b>	<b>304,799</b>	<b>17,118</b>	<b>1,807,495</b>	<b>9,459</b>	<b>1,109,087</b>	<b>187</b>	<b>116,953</b>	<b>27,349</b>	<b>3,338,334</b>
<i>Source: Bank Records from 5/14/2019 through 6/1/2022</i>										

Innovative or Flexible Lending – Regional and State Programs										
Type of Program	2019		2020		2021		2022		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Montana Board of Housing Loans	13	1,511	26	3,398	11	933	2	334	52	6,176
Billings 1 <sup>st</sup> Time Homebuyer	0	0	1	152	1	304	0	0	2	456
Idaho Housing/Finance Association	79	14,815	183	37,591	174	38,933	14	2,208	450	93,547
Washington State Housing/Finance Commission	3	518	5	1,049	7	1,303	1	383	16	3,253
Washington Community Reinvestment Association	4	135	0	0	6	57	0	0	10	192
Rocky Mountain Community Reinvestment Corporation	0	0	9	196	9	326	18	687	36	1,209
Wyoming CD Authority	4	202	17	1,178	44	3,949	17	1,098	82	6,427
Colorado Housing Fund Authority	9	1,516	31	6,585	25	7,132	11	2,559	76	17,792
NW Community Land Trust	1	155	0	0	1	130	0	0	2	285
New Market Tax Credit Lending	0	0	0	0	3	20,553	1	8,200	4	28,753
Low Income Housing Tax Credits	9	40,205	13	87,090	19	118,231	4	36,950	45	282,476
HR Development Council	10	639	6	90	2	144	0	0	18	873
NeighborWorks Pocatello	0	0	0	0	3	512	1	44	4	556
Habitat for Humanity	0	0	2	276	1	130	1	80	4	486
Wyoming Small Business Development	1	178	2	421	0	0	0	0	3	599
Montana Board of Investment	5	1,051	2	296	0	0	3	654	10	2,001
Chelan Valley Housing Trust	0	0	0	0	4	800	0	0	4	800
Methow Housing Trust	0	0	0	0	0	0	3	565	3	565
Big Sky Down Payment Assistance	0	0	3	717	7	120	0	0	10	837
Credit Builder Consumer Loan Program	135	104	217	169	251	266	102	101	705	640
<b>Total</b>	<b>273</b>	<b>61,029</b>	<b>517</b>	<b>139,208</b>	<b>568</b>	<b>193,823</b>	<b>178</b>	<b>53,863</b>	<b>1,536</b>	<b>447,437</b>
Source: Bank Records from 5/14/2019 through 6/1/2022										

The following are examples of notable innovative or flexible lending practices employed during the evaluation period.

- Credit Builder Consumer Loan Program (CBCLP)** – GB created the CBCLP to assist customers unable to qualify for traditional credit to establish or repair their credit history, build assets, and learn to save. CBCLP loans are very small, short-term, savings-secured loans with no origination fees and the possibility of a two percent rate reduction for customers who complete a free financial literacy training course through EverFi Financial Foundations. During the evaluation period, GB originated 705 CBCLP loans totaling \$640,000, representing an average loan amount of approximately \$900.
- Paycheck Protection Program Loans** – In 2020, GB introduced PPP loans which are offered through the SBA and designed to provide a direct incentive for small businesses to keep their workers on payroll. These loans can be used to help fund payroll costs, including benefits, and may also be used to pay for mortgage interest, rent, utilities, worker protection costs related to



COVID-19, uninsured property damage costs caused by looting or vandalism during 2020, and certain supplier costs and expenses for operations. There are no fees charged to small businesses by the government or lenders and loan forgiveness is available if specific employee retention criteria are met. GB originated 24,650 PPP loans totaling approximately \$2 billion during the review period.

- ***FHA Loan*** – An FHA loan is a government-backed mortgage insured by the Federal Housing Administration. These home loans employ flexible features such as lower minimum credit score and down payment requirements than many conventional loans and are often utilized by first-time homebuyers. GB originated 637 such loans for a total of approximately \$145 million during the evaluation period.

### **Community Development Loans**

GB is a leader in making CD loans throughout the AAs. During the evaluation period, the bank originated 733 loans totaling \$1.64 billion. This level of activity represents 8.6 percent of average total assets and 14.8 percent of average total loans. All CD lending metrics increased since the previous evaluation, where GB originated 231 loans totaling \$592.8 million, representing 5.6 percent of average total assets and 8.4 percent of average total loans. This performance compares favorably to other similarly-situated institutions operating throughout the AAs.

Total CD loans consist of 78 CD loans totaling \$175.1 million in 2019, 293 CD loans totaling \$441.7 million in 2020, 253 CD loans totaling \$623.7 million in 2021, and 109 CD loans totaling \$400.3 million year-to-date in 2022. GB conducted the majority of CD lending in the State of Montana while also originating substantial percentage of its lending in Arizona and Idaho. Performance by rated area was consistent throughout all the AAs. Refer to each state analysis for details. GB primarily displayed responsiveness to its AAs through originating Low Income Housing Tax Credit (LIHTC) CD loans targeting affordable housing and through paycheck protection program CD loans targeting revitalization or stabilization. Furthermore, examiners considered five loans totaling \$19.6 million originated outside the bank's AAs since the bank was responsive to the CD needs of the communities within its AAs. The following table presents the bank's CD loans by rated area and CD purpose.

Community Development Lending by Rated Area										
Rated Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Arizona	26	89,611	53	16,971	22	73,851	16	87,229	117	267,662
Colorado	13	56,213	8	12,704	10	29,416	6	24,362	37	122,695
Idaho	11	35,216	30	15,081	13	22,666	15	128,498	69	201,461
Logan MS MSA	-	-	-	-	-	-	-	-	-	-
Montana	84	247,769	153	72,635	49	188,923	80	187,660	366	696,987
Nevada	1	7,000	2	2,950	13	29,624	1	1,700	17	41,274
Utah	11	27,963	1	182	19	52,859	13	46,455	44	127,459
Washington	10	21,959	7	14,707	11	26,193	18	36,612	46	99,471
Wyoming	8	20,609	13	2,945	3	13,477	8	27,270	32	64,301
Nationwide	4	9,849	-	-	1	9,750	-	-	5	19,599
<b>Total</b>	<b>168</b>	<b>516,189</b>	<b>267</b>	<b>138,175</b>	<b>141</b>	<b>446,759</b>	<b>157</b>	<b>539,786</b>	<b>733</b>	<b>1,640,909</b>
<i>Source: Bank Data</i>										

Notable examples of GB's nationwide CD loans include:

- In 2020, GB funded a \$9.8 million SBA 504 loan to a small business outside its AA which provided economic development by helping to create 16 jobs for LMI workers.
- In 2021, GB contributed to affordable housing by funding a \$4.3 million loan outside its AA for a 35 unit LIHTC housing complex specifically for LMI families.
- In 2022, GB contributed to affordable housing by again funding a \$4.3 million loan outside its AA for a 35 unit LIHTC housing complex specifically for LMI families.

## INVESTMENT TEST

The Investment Test is rated "Outstanding." The bank's performance in the rated areas was consistent with this conclusion, with the exception of Arizona and Washington where the performance was below the overall performance conclusion.

### Investment and Grant Activity

GB has an excellent level of qualified CD investments and grants, particularly those not routinely provided by private investors, often in a leadership position. The combined new and prior period CD investments, as well as grants and donations totaled approximately \$486.4 million.

Prior period investments retained across the rated areas totaled \$137.8 million. Of the total new qualified investments, \$66.7 million were made in 2019, \$131.2 million were made in 2020, \$72.5 million were made in 2021, and \$78.2 million were made in 2022.

Total qualified investments represent 2.5 percent of average total assets and 7.6 percent of average total securities as of the March 31, 2022, Call Report. This performance represents an improvement over the previous evaluation, where the percentages were 1.9 percent and 6.9 percent respectively. In addition, the volume of CD investments represents a substantial increase from the previous

evaluation's approximate \$194.4 million in total qualified investments and grants. GB's performance compares favorably to similarly-situated institutions throughout the AAs.

The majority of GB's investment activity included numerous complex investments not routinely provided by private investors such as LIHTC funds for affordable housing and equity-equivalent (EQ2) investments in CD financial institutions (CDFIs). To a lesser extent, GB's investments also included mortgage-backed securities and sponsorships for financial education such as the Everfi school program. The following table details the bank's qualified investments and grants by rated area and CD purpose.

<b>Community Development Investments by Rated Area</b>										
<b>Rated Area</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Arizona	16	40,591	6	2,284	5	950	3	2,361	<b>30</b>	<b>46,186</b>
Colorado	35	184,305	-	-	-	-	-	-	<b>35</b>	<b>184,305</b>
Idaho	16	20,433	4	2,184	3	3,450	4	13,174	<b>27</b>	<b>39,241</b>
Logan MS MSA	-	-	-	-	-	-	-	-	-	-
Montana	37	69,572	8	9,461	3	1,050	8	24,021	<b>56</b>	<b>104,104</b>
Nevada	6	8,310	-	-	-	-	-	-	<b>6</b>	<b>8,310</b>
Utah	8	19,502	-	-	-	-	-	-	<b>8</b>	<b>19,502</b>
Washington	30	34,920	3	1,511	1	1,000	-	-	<b>34</b>	<b>37,431</b>
Wyoming	13	37,166	-	-	2	1,000	1	2,051	<b>16</b>	<b>40,217</b>
<b>Subtotal</b>	<b>161</b>	<b>414,799</b>	<b>21</b>	<b>15,440</b>	<b>14</b>	<b>7,450</b>	<b>16</b>	<b>41,607</b>	<b>212</b>	<b>479,296</b>
Qualified Grants & Donations	163	497	1,990	5,473	118	564	109	581	<b>2,380</b>	<b>7,115</b>
<b>Total</b>	<b>324</b>	<b>415,296</b>	<b>2,011</b>	<b>20,913</b>	<b>132</b>	<b>8,014</b>	<b>125</b>	<b>42,188</b>	<b>2,592</b>	<b>486,411</b>
<i>Source: Bank Data</i>										

### **Responsiveness to Credit and Community Development Needs**

GB exhibits excellent responsiveness to credit and CD needs. The investment strategy during the evaluation period focused on affordable housing initiatives. This demonstrates excellent responsiveness to the primary identified CD need for affordable housing across the bank's AAs. Refer to each individual rated area and AA for specific details.

### **Community Development Initiatives**

GB makes extensive use of innovative and complex investments to support CD initiatives. The bank funded qualifying investments through its AAs primarily using the following complex investment vehicles:

- **LIHTC** – GB's primary vehicle for qualified CD investments are LIHTCs. LIHTCs provide tax incentives to encourage individual and corporate investors to invest in the development, acquisition, and rehabilitation of affordable rental housing. To qualify for the credit, a project must meet strict requirements to qualify as a low-income project. Developers are required to set aside at least 40

percent of the units for renters earning no more than 60.0 percent of the area's median family income, or 20 percent of the units for renters earning 50.0 percent or less of the area's median family income. These units are subject to rent restrictions in which the maximum permissible gross rent must be less than 30 percent of the area's median income. State selection procedures for tax credit allocations often encourage developers to provide more than the minimum number of affordable units. Because these credits are only available for affordable rental units, many applications designate 100 percent of the units in properties as affordable. Developers also reserve some of the units for renters earning well below 50.0 percent of the area's median income. During the evaluation period, GB participated in 45 new LIHTC projects through direct investments. These investments totaled approximately \$144.8 million and were sponsored by federal, state, and local housing agencies and groups.

- **EQ2** – EQ2s are long-term, fully subordinated debt instruments for nonprofit CDFIs. CDFIs leverage these instruments with senior debt to build their lending capacity. Through EQ2s, GB funded several CDFIs that provided innovative and flexible credit products that supported the economic development and affordable housing needs in the AAs. These CDFIs support their local communities by providing early-stage credit, capital, and financial services to small businesses, affordable housing developers, community organizations, and other types of borrowers. During the review period, GB participated in 19 new EQ2 investments totaling \$14.4 million.

Refer to each individual rated area and AA for specific details.

## **SERVICE TEST**

The Service Test is rated “High Satisfactory.” The bank's performance in the rated areas is consistent with this conclusion, with the exception of Washington, which was below the overall performance conclusion.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to geographies and individuals of different income levels in its AAs. GB operates a comprehensive branch structure that consists of 191 full service branches. Of these, 8 are located in low-income geographies, 44 are located in moderate-income geographies, 104 are located in middle-income geographies, and 34 are located in upper-income geographies. A branch office is also located in a geography with a not-applicable income category due to nominal population. GB also operates 277 ATMs of which 49 take deposits. The bank offers 24-hour telephone banking, online banking, bill pay services, remote-deposit capture, mobile banking, and mobile deposit. Specific details related to the accessibility of the bank's delivery systems are contained in each full- and limited-scope analysis.

### **Changes in Branch Locations**

To the extent changes have been made, the institution's record of opening and closing of branches has improved the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the evaluation period, the institution opened or acquired 40 branches: 19 in the Utah AAs, 9 in the Arizona AAs, 7 in the Nevada AAs, 2 in the Montana AAs, 2 in the

Wyoming AAs, and 1 in a Colorado AA. GB also closed three branches during the review period: one in Montana and two in Arizona. Refer to each AA analysis for complete details regarding changes in the bank's branch locations.

### **Reasonableness of Business Hours and Services**

Services, including business hours, do not vary in a way that inconveniences the AAs, particularly LMI geographies and/or individuals. All of the bank's branches offer the same products, which include: deposit products, such as checking, savings, and health savings accounts; money market, individual retirement accounts and certificates of deposit; and loan products, including home mortgage loans, home equity lines of credit, construction loans, personal lines of credit, and overdraft protection loans. Branch location hours and services vary slightly according to AA needs; refer to each individual analysis for details.

### **Community Development Services**

GB provides a relatively high level of CD services in its AAs. Bank staff provided 18,359 CD services hours to organizations throughout the review period. Of the total, 3,474 hours of service were provided in 2019; 5,523 hours of service were provided in 2020; 6,029 hours of service were provided in 2021; and 3,333 hours of service were provided in 2022.

The institution's volume of CD service hours increased 42.6 percent since the previous evaluation where the bank totaled 12,872 service hours. Although GB compared favorably to most similarly-situated institutions, the bank trailed the industry leaders of CD services in its AAs. The majority of the bank's CD service activity targeted community services for LMI populations with fewer activities targeted towards affordable housing or economic development. The following table details the bank's CD services by rated area and CD purpose. Refer to each rated area analysis for further detail.

<b>Community Development Services by Rated Area</b>					
<b>Rated Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b># Hours</b>	<b># Hours</b>	<b># Hours</b>	<b># Hours</b>	<b># Hours</b>
Arizona	452	1,536	841	66	<b>2,895</b>
Colorado	405	1,594	279	97	<b>2,375</b>
Idaho	378	1,998	399	32	<b>2,807</b>
Logan Multistate MSA	-	10	-	-	<b>10</b>
Montana	975	3,885	1,308	491	<b>6,659</b>
Nevada	48	611	1	-	<b>660</b>
Utah	41	650	8	-	<b>699</b>
Washington	374	287	-	-	<b>661</b>
Wyoming	142	747	494	210	<b>1,593</b>
<b>Total</b>	<b>2,815</b>	<b>11,318</b>	<b>3,330</b>	<b>896</b>	<b>18,359</b>
<i>Source: Bank Data</i>					

## **DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

The bank's compliance with the laws relating to discrimination and other illegal credit practices was reviewed, including the Fair Housing Act and the Equal Credit Opportunity Act. Examiners did not identify any discriminatory or other illegal credit practices.

## MONTANA

### CRA RATING FOR MONTANA: SATISFACTORY

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN MONTANA

GB operates in four AAs in the State of Montana; see the following table. In 2020, the bank expanded the Montana Non-MSA AA with the addition of Pondera County. No other changes were made to the Montana AAs since the prior evaluation. Refer to individual AAs for key demographic, economic information, and a summary of applicable changes specific to each.

Description of Assessment Areas		
Assessment Area	Counties in Assessment Area	# of CTs
Montana Non-MSA	Blaine, Chouteau, Deer Lodge, Fergus, Flathead, Gallatin, Garfield, Golden Valley, Jefferson (partial), Judith Basin, Lake, Lewis and Clark, Liberty, Lincoln, Madison (Partial), Petroleum, Pondera, Ravalli, Sanders, Silver Bow, Teton, Wheatland	113
Billings	Carbon, Stillwater, Yellowstone	40
Great Falls	Cascade	2
Missoula	Missoula	20
<i>Source: Bank Data</i>		

### SCOPE OF EVALUATION – MONTANA

Consistent with the overall Scope of Evaluation, home mortgage, small business, and small farm loan products were analyzed for all Montana AAs, with the greatest consideration given to home mortgage and small business loans.

Based on the lending activity, deposit volume, and branch distribution in the following table, the Montana Non-MSA AA was evaluated using full-scope examination procedures and carries greater weight in determining ratings for the State of Montana. The Billings, Great Falls, and Missoula AAs were evaluated using limited-scope examination procedures.

Assessment Area Breakdown of Loans, Deposits, and Branches						
Assessment Area	Loans		Deposits		Branches	
	\$(000s)	% Bank Total	\$(000s)	% Bank Total	#	% Bank Total
Montana Non-MSA	3,814,179	30.9	5,425,504	32.1	48	25.1
Missoula	868,812	7.0	961,622	5.7	7	3.7
Billings	547,983	4.5	810,509	4.8	7	3.7
Great Falls	64,804	0.5	8,970	0.1	1	0.5
<b>Montana</b>	<b>5,295,778</b>	<b>42.9</b>	<b>7,206,605</b>	<b>42.7</b>	<b>63</b>	<b>33.0</b>
<i>Source: Bank Records, FDIC Summary of Deposits (6/30/2021)</i>						

## CONCLUSIONS ON PERFORMANCE CRITERIA IN MONTANA

### LENDING TEST

GB is rated “High Satisfactory” in the Lending Test in the State of Montana. The bank’s performance in the Montana AAs was consistent with this conclusion with the exception of the Great Falls AA, where performance was below the overall conclusion.

#### Lending Activity

GB’s lending levels reflect excellent responsiveness to AA credit needs. Refer to each Montana AA analysis for details.

#### Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the Montana AAs. The bank’s performance in each of the AAs is consistent with this conclusion, with the exception of the Missoula AA where the performance was stronger.

#### Borrower Profile

The distribution of borrowers in Montana reflects good penetration. The bank’s performance in each of the AAs is consistent with this conclusion.

#### Community Development Loans

GB is a leader in making CD loans in the Montana AAs. The bank originated 366 CD loans totaling \$697.0 million in the State of Montana, which includes 9 regional CD loans totaling \$33.3 million during the evaluation period. This performance represents a significant increase since the last examination, when GB made 132 CD loans totaling \$276.9 million. GB primarily targeted affordable housing opportunities through the review period with 84 loans totaling \$247.8 million.

Performance was consistent throughout the Montana AAs except for the Great Falls AA, where performance was weaker due to no activity. The Montana Non-MSA weighed most heavily in forming conclusions while the Great Falls AA contributed minimally. The following table presents



the bank's CD loans in the State of Montana by year and CD purpose. Refer to each individual AA for specific details and notable examples.

Community Development Lending – State of Montana										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2019	15	38,376	15	11,300	7	32,459	5	7,145	42	89,280
2020	29	79,574	77	31,018	17	24,920	25	50,793	148	186,305
2021	24	65,740	43	13,135	14	83,368	43	116,292	124	278,535
YTD 2022	16	64,079	18	17,182	11	48,176	7	13,430	52	142,867
<b>Total</b>	<b>84</b>	<b>247,769</b>	<b>153</b>	<b>72,635</b>	<b>49</b>	<b>188,923</b>	<b>80</b>	<b>187,660</b>	<b>366</b>	<b>696,987</b>
<i>Source: Bank Data</i>										

Notable examples of GB's CD loans in Montana that aren't attributable to a specific AA include:

- In 2021, GB originated an \$8.8 million LIHTC loan that provided 92 units of affordable housing in an area outside the bank's AAs.
- In 2022, GB originated a \$6.4 million LIHTC loan that provided 58 units of affordable housing in an area outside the bank's AAs.
- In 2020, GB originated a \$5.6 million affordable housing loan that provided 60 affordable housing units to LMI renters in an area outside the bank's AAs.

## INVESTMENT TEST

GB is rated "Outstanding" in the Investment Test in the State of Montana. The bank's performance in the Montana AAs was consistent with this conclusion, except for the Great Falls AA, where performance was below the overall performance conclusion.

### Investment and Grant Activity

The bank has an excellent level of qualified CD investments and grants throughout the Montana AAs, particularly those not routinely provided by private investors, often in a leadership position. GB reported a total of \$107.6 million in total qualified investments and grants. This total includes nearly \$3.5 million in grants or donations and approximately \$49.3 million in prior period investments.

This is a significant increase from the prior evaluation, when GB's qualified investments and donations totaled approximately \$58.5 million. The majority of GB's qualified investments and grants or donations targeted affordable housing, an identified CD need for the AAs. The following table details the bank's qualified investments, grants, and donations by year and CD purpose.

Qualified Investments – State of Montana										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	18	24,672	6	1,796	2	550	7	22,247	33	49,264
2019	5	14,512	1	3,650	1	500	-	-	7	18,663
2020	8	13,199	-	-	-	-	-	-	8	13,199
2021	3	8,353	-	-	-	-	1	1,775	4	10,127
YTD 2022	1	8,836	1	4,015	-	-	-	-	4	12,851
<b>Subtotal</b>	<b>37</b>	<b>69,572</b>	<b>8</b>	<b>9,461</b>	<b>3</b>	<b>1,050</b>	<b>8</b>	<b>24,021</b>	<b>56</b>	<b>104,104</b>
Qualified Grants & Donations	73	160	1,007	2,596	82	410	63	331	1,225	3,497
<b>Total</b>	<b>110</b>	<b>69,732</b>	<b>1,015</b>	<b>12,057</b>	<b>85</b>	<b>1,460</b>	<b>71</b>	<b>24,352</b>	<b>1,281</b>	<b>107,601</b>
<i>Source: Bank Data</i>										

GB reported \$485 thousand in qualified prior period investments that aren't attributable to a specific AA. In addition, GB reported three donations throughout the review period totaling \$2 thousand to an affordable housing organization located outside the bank's Montana AAs and one donation totaling \$2 thousand to a small business development center benefitting a greater regional area including the bank's Montana AAs.

### **Responsiveness to Credit and Community Development Needs**

GB exhibits excellent responsiveness to credit and CD needs. The bank demonstrated responsiveness to its Montana AAs through its focus on funding investments targeting the identified community need of affordable housing. Overall, GB funded \$69.6 million in qualified investments targeted to affordable housing needs.

### **Community Development Initiatives**

GB makes extensive use of innovative and complex investments in the Montana AAs to support CD initiatives. In the Montana AAs, the bank funded 17 LIHTC investments totaling \$55.6 million and 7 EQ2 investments totaling \$7.0 million. Refer to the bank-wide Community Development Initiatives for further details on the bank's initiatives.

### **SERVICE TEST**

GB is rated "High Satisfactory" in the Service Test in the State of Montana. The bank's performance in the Montana AAs was consistent with this conclusion, with the exception of the Great Falls AA, where performance was below the overall performance conclusion.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the institution's Montana AAs. GB operates a 63 full-service branches located throughout the Montana AAs: 2 located in low-income CTs, 20 located in moderate-income CTs, 34 located in middle-income CTs, and 7 located in upper-

income CTs. Additionally, 11 of the bank’s branches are located in middle-income geographies designated as distressed or underserved. Refer to each full- and limited-scope analysis for specific details.

### **Changes in Branch Locations**

To the extent changes have been made, the institution’s record of opening and closing of branches has improved the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. GB opened two branches in the Montana non-MSA AA and closed one during the evaluation. Refer to each respective full- or limited-scope analysis for complete details.

### **Reasonableness of Business Hours and Services**

Services, including business hours, do not vary in a way that inconveniences the Montana AAs, particularly LMI geographies and/or individuals. All of the bank’s products and services are available at each of the branches throughout the Montana AAs. Saturday hours are offered at 29 of the 63 branch locations, and 55 of the branches provide drive-up service. Branch locations have similar hours that vary slightly according to AA needs. Refer to each AA for details.

### **Community Development Services**

GB provides a relatively high level of CD services in its Montana AAs. Bank staff provided 6,659 CD services hours to organizations throughout the review period. The volume of CD service hours in the Montana AAs increased 11.6 percent since the previous evaluation where the bank totaled 5,969 service hours.

While employees performed services targeting all four CD areas, the majority of service activity targeted community services for LMI populations. The substantial majority of service hours were provided in the Montana Non-MSA AA, which was also weighted the heaviest in determining conclusions. The following table details the bank’s CD services in the Montana AAs by year and CD purpose. Refer to each full- and limited-scope analysis for further detail.

<b>Community Development Services – State of Montana</b>					
<b>Activity Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b># Hours</b>	<b># Hours</b>	<b># Hours</b>	<b># Hours</b>	<b># Hours</b>
2019	241	731	197	54	<b>1,223</b>
2020	281	1,181	439	115	<b>2,016</b>
2021	306	1,260	504	257	<b>2,327</b>
YTD 2022	147	713	168	65	<b>1,093</b>
<b>Total</b>	<b>975</b>	<b>3,885</b>	<b>1,308</b>	<b>491</b>	<b>6,659</b>
<i>Source: Bank Data</i>					

Bank employees provided 10 CD service hours that benefitted a greater regional area within Montana that aren’t attributable to a specific AA. Notable examples of these services include:

- In 2019, an Officer of the bank contributed seven hours on the Board of an organization that provides food and food services for LMI individuals and families within a broad multi-county area outside the bank's AAs.
- In 2019, a GB loan officer provided three hours on a committee for an economic development organization that provides support for small businesses within a broad multi-county area outside the bank's AAs.

## **MONTANA NON-MSA – Full-Scope Review**

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE MONTANA NON-MSA**

The Montana Non-MSA AA consists of 113 CTs that comprise the following 22 counties: Blaine, Chouteau, Deer Lodge, Fergus, Flathead, Gallatin, Garfield, Golden Valley, Judith Basin, Lake, Lewis and Clark, Liberty, Lincoln, Petroleum, Pondera, Ravalli, Sanders, Silver Bow, Teton, and Wheatland. GB also included CTs 9622.01 and 9622.02, which represent a portion of Jefferson County and CT 1.00, which represents a portion of Madison County. In 2021, GB's AA expanded with the addition of Pondera County.

#### **Economic and Demographic Data**

The AA consists of 3 low-, 23 moderate-, 64 middle-, and 23 upper-income CTs. See the following.

Demographic Information of the Assessment Area						
Assessment Area: GB MT Non MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	113	2.7	20.4	56.6	20.4	0.0
Population by Geography	452,883	2.5	18.1	55.0	24.4	0.0
Housing Units by Geography	226,158	2.0	19.5	57.0	21.4	0.0
Owner-Occupied Units by Geography	126,325	1.0	17.1	56.3	25.5	0.0
Occupied Rental Units by Geography	58,301	4.3	23.0	53.8	18.8	0.0
Vacant Units by Geography	41,532	1.8	21.8	63.8	12.6	0.0
Businesses by Geography	66,718	1.7	14.4	54.0	29.9	0.0
Farms by Geography	4,521	0.3	18.6	61.9	19.1	0.0
Family Distribution by Income Level	115,116	20.1	18.2	21.5	40.2	0.0
Household Distribution by Income Level	184,626	23.4	16.8	17.5	42.4	0.0
Median Family Income Non-MSAs - MT		\$59,777	Median Housing Value			\$218,749
			Median Gross Rent			\$751
			Families Below Poverty Level			10.0%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

The AA contains 16 underserved middle-income CTs. Four of these tracts are also designated as distressed middle-income geographies due to high rates of poverty, unemployment, or population loss. Housing values are substantially higher than the median family income in the AA. The high rate of families living below the poverty level pose challenges for families to qualify for and obtain home mortgage loans.

Significant industries across the Montana AA include: social services; retail trade and wholesale trade; agriculture, transportation; construction; and public administration.

Unemployment levels in the AA vary and are generally showing improvement since the peak levels observed during the height of the pandemic, which is consistent with the state and the nation.

Particularly high rates of unemployment were noted in Flathead, Lincoln, and Sanders Counties.

The following table illustrates unemployment levels for each county compared to Montana and the nation.

<b>Unemployment Rates – Montana Non-MSA</b>			
<b>Area</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
	<b>%</b>	<b>%</b>	<b>%</b>
Blaine County	4.0	4.7	3.8
Chouteau County	2.8	3.8	2.7
Deer Lodge County	3.3	5.0	3.3
Fergus County	3.2	4.5	3.3
Flathead County	4.8	7.7	4.0
Gallatin County	2.3	4.9	2.4
Garfield County	2.4	2.7	2.6
Golden Valley County	4.1	4.7	3.5
Jefferson County	3.4	5.0	3.2
Judith Basin County	3.1	4.7	2.7
Lake County	4.3	6.1	3.8
Lewis and Clark County	3.1	4.9	3.0
Liberty County	2.6	2.7	2.4
Lincoln County	7.4	10.0	6.0
Madison County	3.3	5.0	3.2
Petroleum County	3.7	3.3	2.6
Pondera County	3.8	4.8	3.2
Ravalli County	4.2	5.7	3.6
Sanders County	6.0	7.7	4.8
Silver Bow County	3.9	6.5	3.6
Teton County	3.3	4.3	3.1
Wheatland County	3.8	7.0	5.3
Montana	3.6	5.8	3.4
National Average	3.7	8.1	5.3
<i>Source: Bureau of Labor Statistics</i>			

## **Competition**

The Montana Non-MSA AA has a moderate level of competition for financial services. According to the June 30, 2021 Deposit Market Share Report, GB ranked 1<sup>st</sup> out of 30 FDIC-insured institutions competing within the AA, with a total of 35.8 percent of the deposit market share. According to the same data, the bank has 48 out of 178 branches in the AA.

## **Community Contact**

Examiners reviewed an existing community contact conducted with a non-profit organization that focuses on supporting community-centered economic development in the southwestern portion of the state. The organization's emphasis is assisting business start-ups and growth in order to strengthen the region's economy and communities. According to the contact, the AA felt the effects of the pandemic, with the travel and tourism industries being impacted the hardest. The contact noted that most sectors are recovering with some expansion in construction. The fast growth of the economy has been hindered by a shortage of employees even though the area is experiencing a rapidly growing population. The lack of affordable housing options and dependable childcare were cited as contributing factors for a dwindling workforce. The contact noted that local financial institutions are involved with housing development, but small businesses may experience challenges obtaining funding due to not meeting credit criteria requirements maintained by lenders. Furthermore, borrowers in rural areas may not have easy access to credit due to their locations.

## **Credit and Community Development Needs and Opportunities**

Considering community contact information and key economic and demographic data indicators, access to affordable housing represents a primary credit need for the AA. Opportunities exist for developing and implementing banking products that provide additional flexibility in traditional credit worthiness criteria and accessibility to borrowers in surrounding geographies.

# **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE MONTANA NON-MSA**

## **LENDING TEST**

Lending levels within the Montana Non-MSA AA reflect excellent responsiveness. The geographic distribution of loans reflects adequate penetration throughout the AA. The distribution of borrowers reflects good penetration. GB is a leader in making CD loans in the AA.

## **Lending Activity**

GB's lending levels reflect excellent responsiveness to AA credit needs. During the review period, GB originated 11,224 small business loans totaling \$979.2 million, 9,355 home mortgage loans totaling \$2.5 billion, and 3,407 small farm loans totaling \$299.7 million.

In the prior evaluation, the bank originated 2,768 small business loans totaling \$278.4 million, 2,860 home mortgage loans totaling \$721.1 million, and 874 small farm loans totaling \$88.3 million. GB's ranking among other lenders also improved for each product reviewed.

Aggregate lending data from 2020 shows a total of 16,935 small business loans were originated by 152 lenders in the AA. GB ranked 1<sup>st</sup> among this group, with 34.3 percent of the total market share. GB also ranked 1<sup>st</sup> among 435 lenders originating home mortgage loans. Peer mortgage data from 2020, shows the bank with a total of 12.2 percent of the 41,574 mortgage loans originated. In addition, aggregate lending data from 2020 shows 20 lenders originated a total of 2,313 small farm loans. GB ranked 1<sup>st</sup> among this group, with a total of 47.9 percent market share.

### **Geographic Distribution**

The bank's geographic distribution of loans reflects adequate penetration throughout the AA. Adequate small business, home mortgage, and small farm performance support this conclusion.

#### *Small Business*

The geographic distribution of small business loans reflects adequate penetration throughout the AA. The bank's small business lending to low-income geographies was in line with data reported by aggregate lenders and only slightly below demographics during the review period. Similarly, lending within moderate-income geographies was in line with aggregate and demographics.

#### *Home Mortgage*

Home mortgage lending performance in the AA is adequate. GB's home mortgage lending to low-income areas was commensurate with aggregate performance and demographics during the review period. Lending to moderate-income tracts was also comparable with aggregate data and slightly below demographics.

#### *Small Farm*

Opportunity for lending to small farms located in low-income tracts during the review period was minimal; however, GB's lending was in line with demographic and aggregate data. Performance in moderate-income geographies was also commensurate with that of peer lenders and D&B data throughout the same time period.

### **Borrower Profile**

The distribution of borrowers reflects good penetration among retail customers of different income levels and businesses and farms of different sizes. Good small business, adequate home mortgage, and excellent small farm lending performance support this conclusion.

#### *Small Business*

The distribution of borrowers reflects good penetration to businesses with GARs of \$1 million or less. GB's lending to small businesses was substantially above aggregate data in 2019. The bank's performance declined slightly in 2020, but remained well above peer data. GB's performance trended upward in 2021, but remained below D&B data.

### *Home Mortgage*

The distribution of borrowers reflects adequate penetration to LMI borrowers. GB's lending to low-income borrowers was below demographic data; however, it trended upward each year in the review period and was above the rate achieved by aggregate lenders for 2019 and 2020. The bank's record of lending to moderate-income borrowers was also below demographics for the evaluation period, but was above peer data for each year.

### *Small Farm*

The distribution of borrowers reflects excellent penetration to farms with GARs of \$1 million or less. GB's lending to small farms was significantly above peer data for 2019 and 2020 and slightly below D&B data for the review period.

### **Community Development Loans**

GB is a leader in making CD loans in the MT Non-MSA AA where the bank originated 246 CD loans totaling \$487.8 million. This performance represents a significant increase since the last examination, when GB made 78 CD loans totaling \$157.0 million in the MT Non-MSA AA. GB split its efforts evenly among loans targeting affordable housing, economic development, and revitalization or stabilization with fewer total loans by dollar targeting community services.

GB's CD loan performance in the MT Non-MSA AA is consistent with the bank's performance in the State of Montana. The following table presents the bank's CD loans in the MT Non-MSA AA by year and CD purpose.

<b>Community Development Lending – MT Non-MSA</b>										
<b>Activity Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
2019	12	32,636	9	5,321	7	32,459	5	7,145	33	77,561
2020	21	64,046	53	23,484	12	16,018	17	32,892	103	136,440
2021	11	11,920	30	12,058	12	80,662	21	89,904	74	194,544
YTD 2022	10	39,347	14	17,041	6	10,425	6	12,427	36	79,240
<b>Total</b>	<b>54</b>	<b>147,949</b>	<b>106</b>	<b>57,904</b>	<b>37</b>	<b>139,564</b>	<b>49</b>	<b>142,368</b>	<b>246</b>	<b>487,785</b>
<i>Source: Bank Data</i>										

Notable examples of GB's CD loans in the MT Non-MSA AA include:

- In 2021, GB participated in a \$70.0 million economic development loan as the lead lender to develop a small airport providing 31 new permanent jobs to LMI workers.
- In 2020, GB originated a \$26.0 million LIHTC loan that provided 136 units of affordable housing to LMI individuals and families in the AA.
- In 2022, GB originated a \$22.5 million LIHTC loan that provided 114 units of affordable housing to LMI individuals and families in the AA.



## **INVESTMENT TEST**

GB has an excellent level of qualified CD investments and grants in the AA, exhibits excellent responsiveness to credit and CD needs, and makes extensive use of innovative and complex investments to support CD initiatives.

### **Investment and Grant Activity**

The institution has an excellent level of qualified CD investments, grants, and donations, particularly those not routinely provided by private investors, often in a leadership position. During the evaluation period, GB made \$31.8 million in new investments, continued to hold \$33.7 million in prior period investments, and provided nearly \$1.9 million in donations that directly benefited the AA.

This level is a significant increase from the prior evaluation when GB's qualified investments and donations totaled \$37.6 million. The majority of GB's investments focused on the provision of affordable housing, a primary CD need identified in the AA. The following table details the bank's investments and donations by year and CD purpose.

<b>Qualified Investments – MT Non-MSA</b>										
<b>Activity Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Prior Period	8	18,048	4	1,461	-	-	4	14,192	16	33,701
2019	3	12,512	-	-	-	-	-	-	3	12,512
2020	7	10,199	-	-	-	-	-	-	7	10,199
2021	2	3,250	-	-	-	-	1	1,775	3	5,025
YTD 2022	1	63	1	4,015	-	-	-	-	2	4,078
<b>Subtotal</b>	<b>21</b>	<b>44,072</b>	<b>5</b>	<b>5,476</b>	<b>-</b>	<b>-</b>	<b>5</b>	<b>15,967</b>	<b>31</b>	<b>65,515</b>
Qualified Grants & Donations	44	92	742	1,424	41	104	57	267	884	1,886
<b>Total</b>	<b>65</b>	<b>44,164</b>	<b>747</b>	<b>6,900</b>	<b>41</b>	<b>104</b>	<b>62</b>	<b>16,234</b>	<b>915</b>	<b>67,401</b>
<i>Source: Bank Data</i>										

The following are notable examples of investments and donations made in the MT Non-MSA AA.

- In 2019, GB invested in a \$6.1 million LIHTC investment that provided 37 units of affordable housing to LMI individuals and families in the AA.
- In 2020, GB funded a \$3.5 million investment in state housing bond in support of affordable housing for LMI single family home buyers in the AA.
- In 2019, GB invested in a \$3.1 million LIHTC investment that provided 48 units of affordable housing to LMI individuals and families in the AA.

## **Responsiveness to Credit and Community Development Needs**

GB exhibits excellent responsiveness to credit and CD needs. The bank demonstrated responsiveness to the AA through its focus on funding investments targeting the identified community need of affordable housing. Overall, GB funded \$44.1 million in qualified investments targeted to affordable housing needs.

## **Community Development Initiatives**

GB makes extensive use of innovative and complex investments in the AA to support CD initiatives. In this AA, the bank funded 11 LIHTC investments totaling \$36.7 million. Refer to the bank-wide Community Development Initiatives for further details on the bank's initiatives.

## **SERVICE TEST**

Delivery systems are accessible to essentially all portions of the Montana Non-MSA AA. Services, including business hours, do not vary in a way that inconveniences certain portions of the AA, particularly LMI geographies and/or individuals. GB provides a relatively high level of CD services in the AA. The institution's opening and closing of branches has improved the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.

## **Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the institution's AA. The bank doesn't have any branches located in low-income CTs; however, aggregate data shows that only 2.1 percent of all other institution's branches are located in these tracts. Twelve, or 25.0 percent, of the bank's branches are located in moderate-income CTs, which compares favorably to the 21.6 percent of branches operated in these geographies by other institutions and is above the percentage of households, families, and businesses in this area. GB also has 30 branches located in middle-income tracts and 6 located in upper-income tracts.

## **Changes in Branch Locations**

The institution's opening and closing of branches has improved the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the evaluation period the bank opened two branches in this AA. A branch was opened in a moderate-income geography and a branch was opened in a middle-income geography. GB also closed a branch in a middle-income geography.

## **Reasonableness of Business Hours and Services**

Services, including business hours, do not vary in a way that inconveniences certain portions of the AA, particularly LMI geographies and/or individuals. Services and business hours are virtually the same in the Montana Non-MSA as those discussed in the Service Test portion for the State of Montana. A total of 24 of the 48 branch locations offer Saturday hours. Forty-one branches located in this AA offer drive up service.

## **Community Development Services**

The bank provides a relatively high level of CD services in the MT Non-MSA AA. During the evaluation period, bank staff provided 4,880 hours of qualified CD services. Service hours decreased slightly from the prior evaluation, when GB employees provided 4,963 hours to the AA.

The majority of services provided by the bank targeted community services; however, bank staff also provided 851 hours towards affordable housing initiatives, reflecting good responsiveness to the credit needs in the community. The following table details the institution's CD services for each year of the evaluation period by year and type of service provided.

<b>Community Development Services – MT Non-MSA</b>					
<b>Activity Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b># Hours</b>	<b># Hours</b>	<b># Hours</b>	<b># Hours</b>	<b># Hours</b>
2019	204	477	137	38	<b>856</b>
2020	254	940	283	115	<b>1,592</b>
2021	289	736	365	242	<b>1,632</b>
YTD 2022	104	537	131	28	<b>800</b>
<b>Total</b>	<b>851</b>	<b>2,690</b>	<b>916</b>	<b>423</b>	<b>4,880</b>
<i>Source: Bank Data</i>					

Notable examples of CD services in the MT Non-MSA AA include:

- From 2020 to 2022, a GB Senior Vice President contributed 49 hours serving on the Board for a local affordable housing organization in the AA.
- In 2022, a GB teller contributed 23 community services hours teaching financial literacy classes at two elementary schools that consists primarily of LMI students in the AA.
- From 2019 to 2022, a GB loan officer contributed 65 hours serving on the Board of a local non-profit that provides essential community services to at-risk LMI youth in the AA.

## OTHER ASSESSMENT AREAS – Limited-Scope Review

### CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED-SCOPE ASSESSMENT AREAS

The following table summarizes performance in each limited-scope AA as compared to performance in the State of Montana AAs in which full-scope procedures were conducted. The conclusions are based on a review of available facts and data, aggregate lending comparisons and demographic information. The conclusions from the areas reviewed using limited-scope procedures did not impact or alter the institution's overall performance rating.

Assessment Area	Lending Test	Investment Test	Service Test
Missoula	Consistent	Consistent	Consistent
Billings	Consistent	Consistent	Consistent
Great Falls	Below	Below	Below

The following facts and data support the conclusions for each limited-scope AA. Also included are details regarding the number and dollar volume of small business, home mortgage, small farm, and community development loans originated during the review period; qualified investments (new and prior period) and donations during the review period; and community development services for the review period. Unless otherwise noted, Branch distribution and service hours are consistent with Montana overall, and products, services, and alternative delivery systems are discussed at the institution level. Additional information is in the Limited-Scope Assessment Areas Appendices.

#### Missoula

GB operates seven full-service branches in the AA. Of these, two are located in low-income geographies, three are located in moderate-income geographies, and two are located in middle-income geographies. No branches were open or closed since the previous evaluation. The following table details the bank's activities in this AA.

Activity	#	\$
Small Business Loans	3,374	379,952
Home Mortgage Loans	1,875	487,493
Small Farm Loans	27	1,367
Community Development Loans	80	141,231
Investments (New)	-	-
Investments (Prior Period)	5	6,421
Donations	221	964
CD Services	830	-
<i>Source: Bank Data</i>		

#### Billings

GB operates seven full-service branches in the AA. Of these, none are located in low-income geographies, five are located in moderate-income geographies, and one branch is located in each a middle- and an upper-income geography. No branches were opened or closed since the previous examination. The following table details the bank's activities in this AA.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	1,608	174,292
Home Mortgage Loans	1,831	364,940
Small Farm Loans	131	8,751
Community Development Loans	31	34,626
Investments (New)	6	14,273
Investments (Prior Period)	7	8,460
Donations	116	642
CD Services	932	-
<i>Source: Bank Data</i>		

### **Great Falls**

The bank has a branch located in the Great Falls MSA AA in a middle-income geography. No branches were opened or closed in the Great Falls MSA during the evaluation period. The following table details the bank's activities in this AA.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	226	21,535
Home Mortgage Loans	65	28,167
Small Farm Loans	174	15,102
Community Development Loans	-	-
Investments (New)	-	-
Investments (Prior Period)	1	197
Donations	-	-
CD Services	8	-
<i>Source: Bank Data</i>		

## IDAHO

**CRA RATING FOR IDAHO: SATISFACTORY**

**The Lending Test is rated: High Satisfactory**

**The Investment Test is rated: Outstanding**

**The Service Test is rated: High Satisfactory**

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN IDAHO

GB operates within five AAs in the State of Idaho; see the following table. The institution has not made any changes to the Idaho AAs since the prior evaluation. Refer to individual AAs for key demographic and economic information specific to each.

Description of Assessment Areas		
Assessment Area	Counties in Assessment Area	# of CTs
Coeur d'Alene	Kootenai	25
Boise City	Ada, Canyon	88
Idaho Falls-Rexburg-Blackfoot	Bonneville, Jefferson, Bingham, Fremont, Madison	42
Pocatello	Bannock, Power	24
Idaho Non-MSA	Blaine, Bonner, Boundary, Teton	16
Source: Bank Data		

### SCOPE OF EVALUATION – IDAHO

Consistent with the overall Scope of Evaluation, home mortgage, small business, and small farm loan products were analyzed for all Idaho AAs, with the greatest consideration given to home mortgage and small business loans.

Based on the lending activity, deposit volume, and branch distribution in the following table, the Coeur d'Alene AA was evaluated using full-scope examination procedures and carries greater weight in determining ratings for the State of Idaho. The Boise City, Idaho Falls-Rexburg-Blackfoot, Pocatello, and Idaho Non-MSA AAs were evaluated using limited-scope examination procedures.

Assessment Area Breakdown of Loans, Deposits, and Branches						
Assessment Area	Loans		Deposits		Branches	
	\$(000s)	% Bank Total	\$(000s)	% Bank Total	#	% Bank Total
Coeur d’Alene	1,156,046	9.4	790,369	4.7	4	2.2
Boise City	413,757	3.3	600,430	3.6	7	3.7
Idaho Non-MSA	562,134	4.6	639,400	3.8	6	3.1
Idaho Falls-Rexburg-Blackfoot	307,456	2.5	178,753	1.0	2	1.0
Pocatello	317,398	2.6	199,839	1.2	3	1.5
<b>Idaho</b>	<b>2,756,791</b>	<b>22.4</b>	<b>2,408,791</b>	<b>14.3</b>	<b>22</b>	<b>11.5</b>
<i>Source: Bank Records, FDIC Summary of Deposits (6/30/2021)</i>						

## CONCLUSIONS ON PERFORMANCE CRITERIA IN IDAHO

### LENDING TEST

GB is rated “High Satisfactory” in the Lending Test in the State of Idaho. The bank’s performance in each of the Idaho AAs was consistent with this conclusion, with the exception of the Non-MSA AA, where performance was stronger.

#### Lending Activity

GB’s lending levels reflect good responsiveness to AA credit needs. Refer to each Idaho AA analysis for details.

#### Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout each of the Idaho AAs.

#### Borrower Profile

The distribution of borrowers in Idaho reflects adequate penetration. GB’s performance in each AA was consistent with this conclusion, with the exception of the Boise and Non-MSA AAs, where performance was stronger.

#### Community Development Loans

GB is a leader in making CD loans in the Idaho AAs. The bank originated 69 CD loans totaling \$201.5 million in the State of Idaho, which includes 4 regional CD loans totaling \$21.2 million during the evaluation period. This performance represents a significant increase since the last examination, when GB made 33 CD loans totaling \$133.8 million. GB primarily targeted revitalization or stabilization opportunities throughout the review period with 69 loans totaling \$128.5 million.

Performance was consistent throughout the Idaho AAs except for the Idaho Falls AA, where performance was weaker. The Coeur d’Alene AA weighed most heavily in forming conclusions while the Idaho Falls AA contributed minimally. The following table presents the bank’s CD loans in the State of Idaho by year and CD purpose. Refer to each individual AA for specific details and notable examples.

<b>Community Development Lending – State of Idaho</b>										
<b>Activity Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
2019	-	-	1	2,474	3	4,487	2	8,450	<b>6</b>	<b>15,411</b>
2020	5	18,753	13	5,503	2	2,408	6	36,584	<b>26</b>	<b>63,248</b>
2021	4	10,231	11	6,799	4	8,175	4	21,608	<b>23</b>	<b>46,814</b>
YTD 2022	2	6,232	5	305	4	7,595	3	61,855	<b>14</b>	<b>75,988</b>
<b>Total</b>	<b>11</b>	<b>35,216</b>	<b>30</b>	<b>15,081</b>	<b>13</b>	<b>22,666</b>	<b>15</b>	<b>128,498</b>	<b>69</b>	<b>201,461</b>
<i>Source: Bank Data</i>										

Notable examples of GB’s CD loans in Idaho that aren’t attributable to a specific AA include:

- In 2021, GB originated a \$9.5 million revitalization loan within an Opportunity Zone outside its AAs to build a mixed-use property in accordance with a local renewal district plan. This property will primarily house nine affordable units for LMI renters, but also rent space for a women’s small business incubator.
- In 2022, GB originated a \$2.1 million LIHTC loan that provided 45 units of affordable housing in an area outside the bank’s AAs.
- In 2019, GB originated a \$7.7 million revitalization loan in conjunction with a CD Block Grant Fund to replace the existing sewer lagoons for the city of Malad, which is located in a designated underserved geography outside the bank’s AAs.

## **INVESTMENT TEST**

GB is rated “Outstanding” in the Investment Test in the State of Idaho. The bank’s performance in the Idaho AAs was consistent with this conclusion, except for the Coeur d’Alene and Pocatello AAs, where performance was slightly below the overall performance conclusion.

### **Investment and Grant Activity**

The bank has an excellent level of qualified CD investments and grants throughout the Idaho AAs, particularly those not routinely provided by private investors, often in a leadership position. GB reported a total of \$40.4 million in total qualified investments and grants in the State of Idaho. This total includes approximately \$1.1 million in grants or donations and nearly \$5.4 million in prior period investments.



The level of investments represents a significant increase from the prior evaluation, when GB's qualified investments and donations totaled approximately \$20.0 million. In addition, the majority of GB's qualified investments and grants or donations targeted affordable housing, an identified CD need for the AAs. The following table details the bank's qualified investments, grants, and donations by year and CD purpose.

Qualified Investments – State of Idaho										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	8	236	4	2,184	2	2,950	-	-	14	5,370
2019	2	6,806	-	-	1	500	-	-	3	7,306
2020	2	4,548	-	-	-	-	-	-	2	4,548
2021	3	7,750	-	-	-	-	3	9,776	6	17,526
YTD 2022	1	1,093	-	-	-	-	1	3,398	2	4,491
<b>Subtotal</b>	<b>16</b>	<b>20,433</b>	<b>4</b>	<b>2,184</b>	<b>3</b>	<b>3,450</b>	<b>4</b>	<b>13,174</b>	<b>27</b>	<b>39,241</b>
Qualified Grants & Donations	42	163	266	768	16	89	7	106	331	1,126
<b>Total</b>	<b>58</b>	<b>20,596</b>	<b>270</b>	<b>2,952</b>	<b>19</b>	<b>3,539</b>	<b>11</b>	<b>13,280</b>	<b>358</b>	<b>40,367</b>
<i>Source: Bank Data</i>										

In 2021, GB reported one revitalization or stabilization investment totaling \$3.6 million located in Idaho, but outside the bank's AAs. The bank made the investment in conjunction with a loan to construct a mixed-use property in order to revitalize an area within an Opportunity Zone. See the State of Idaho CD loans notable examples for more information.

### **Responsiveness to Credit and Community Development Needs**

GB exhibits good responsiveness to credit and CD needs. The bank demonstrated good responsiveness to its Idaho AAs through its focus on funding investments targeting the identified community need of affordable housing. Overall, GB funded \$20.4 million in qualified investments targeted to affordable housing needs.

### **Community Development Initiatives**

GB makes extensive use of innovative and complex investments in the Idaho AAs to support CD initiatives. In the Idaho AAs, the bank funded 5 LIHTC investments totaling \$14.3 million and 3 EQ2 investments totaling \$3.5 million. Refer to the bank-wide Community Development Initiatives for further details on the bank's initiatives.

### **SERVICE TEST**

GB is rated "High Satisfactory" in the Service Test in the State of Idaho. The bank's performance in the Boise AA was consistent with this conclusion. Performance in the Non-MSA and Idaho Falls AAs was below the overall performance conclusion and performance in the Pocatello AA was above the overall performance conclusion.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the institution's Idaho AAs. GB operates 22 full-service branches located throughout the bank's 5 AAs in Idaho. Two of the bank's branches are located in low-income CTs, 4 branches are located in moderate-income CTs, 13 branches are located in middle-income CTs, and 3 branches are located in upper-income CTs. Refer to each full- and limited-scope analysis for additional details regarding accessibility of delivery systems.

### **Changes in Branch Locations**

GB did not open or close any branches in the Idaho AAs during the evaluation period; as such this criterion did not affect conclusions for the state.

### **Reasonableness of Business Hours and Services**

Services, including business hours, do not vary in a way that inconveniences certain portions of the Idaho AAs, particularly LMI geographies and/or individuals. All of the bank's products and services are available at each of the branches throughout Idaho. Branch locations have similar hours that vary slightly according to AA needs. A total of 17 of the 22 branch locations offer Saturday hours. All but one of the branches in the AA provide drive-up service. Refer to each full- and limited-scope analysis for additional details.

### **Community Development Services**

GB provides a relatively high level of CD services in its Idaho AAs. Bank staff provided 2,807 CD services hours to organizations throughout the review period. The volume of CD service hours in the Idaho AAs decreased 20.9 percent since the previous evaluation where the bank totaled 3,550 service hours.

While employees performed services targeting all four CD areas, the majority of service activity targeted community services for LMI populations. The Coeur d'Alene AA and Pocatello AA provided the majority of GB's service hours in Idaho. The Coeur d'Alene AA was also weighted the heaviest in determining conclusions. The following table details the bank's CD services in the Idaho AAs by year and CD purpose. Refer to each full- and limited-scope analysis for further detail.

<b>Community Development Services – State of Idaho</b>					
<b>Activity Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b># Hours</b>	<b># Hours</b>	<b># Hours</b>	<b># Hours</b>	<b># Hours</b>
2019	78	510	69	20	<b>677</b>
2020	102	658	116	12	<b>888</b>
2021	121	535	157	-	<b>813</b>
YTD 2022	77	295	57	-	<b>429</b>
<b>Total</b>	<b>378</b>	<b>1,998</b>	<b>399</b>	<b>32</b>	<b>2,807</b>
<i>Source: Bank Data</i>					

In 2022, one bank employee provided one CD service hour that benefitted a greater regional area within Montana that isn't attributable to a specific AA. This manager provided mentorship and financial expertise as part of a mentoring program to LMI students in a program located outside the bank's AAs.

## **COEUR D'ALENE– Full-Scope Review**

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN COEUR D'ALENE**

The Coeur d'Alene AA consists of all 25 CTs in Kootenai County, which comprises the Coeur d'Alene MSA #17660. GB has not made any changes to the AA since the previous evaluation.

#### **Economic and Demographic Data**

The AA consists of 5 moderate-, 16 middle-, and 4 upper-income CTs. The AA does not contain any low-income CTs. See the following table for additional demographic information.

Demographic Information of the Assessment Area						
Assessment Area: GB ID Coeur d’Alene MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	25	0.0	20.0	64.0	16.0	0.0
Population by Geography	145,046	0.0	18.1	68.7	13.1	0.0
Housing Units by Geography	65,272	0.0	17.2	68.9	13.8	0.0
Owner-Occupied Units by Geography	39,582	0.0	12.8	72.0	15.3	0.0
Occupied Rental Units by Geography	16,839	0.0	30.3	61.6	8.1	0.0
Vacant Units by Geography	8,851	0.0	12.4	69.5	18.1	0.0
Businesses by Geography	23,471	0.0	20.7	65.8	13.5	0.0
Farms by Geography	746	0.0	16.5	69.7	13.8	0.0
Family Distribution by Income Level	38,705	18.0	20.3	22.7	39.0	0.0
Household Distribution by Income Level	56,421	21.8	17.7	19.8	40.7	0.0
Median Family Income MSA - 17660 Coeur d'Alene, ID MSA		\$58,966	Median Housing Value			\$203,695
			Median Gross Rent			\$868
			Families Below Poverty Level			9.4%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

The median family income is relatively low in comparison to median housing values, making it difficult for families to service mortgage debt. According to Moody's Analytics, the AA has one of the strongest housing markets in the nation; however, housing prices in the AA are rising as the

affordability declines. The AA is attractive to businesses due to low costs and office rents, but vaccine mandates and slow growing wages have strained the availability of personnel to fill positions. Tourism plays a large role in the local economy, but recent staffing shortages and reduced demand for domestic travel have slowed growth in this market. The healthcare industry is also important in the area's economy but is experiencing similar shortages of workers as other sectors. Kootenai Health, Hagadone Hospitality Co., Qualfon Inc., Willamette Dental Group, and Coeur d'Alene Tribal Casino are among the area's largest employers.

Unemployment levels in the AA are slightly above state averages and slightly below those for the nation. They are showing improvement since the levels experienced during the peak of the pandemic. The following table illustrates unemployment levels for the AA compared to Idaho and the nation.

<b>Unemployment Rates – Coeur d'Alene MSA</b>			
<b>Area</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
	<b>%</b>	<b>%</b>	<b>%</b>
Kootenai County	3.6	7.1	4.3
Idaho	3.0	5.5	3.6
National Average	3.7	8.1	5.3
<i>Source: Bureau of Labor Statistics</i>			

### **Competition**

There is a moderate level of competition for financial services in the AA. According to the June 30, 2021 Deposit Market Share Report, GB ranked 2<sup>nd</sup> out of 13 FDIC-insured institutions competing within the AA, with a total of 13.1 percent of the deposit market share. According to the same data, the bank has 4 out of 38 branches in the AA.

### **Community Contact**

Examiners reviewed an existing community contact with an organization that helps provide solutions to facilitate business retention, expansion, and attraction. The contact noted that the area experienced challenges with the high cost of land and lack of personnel for staffing positions and that financial education for small businesses is currently needed. However, the contact indicated there are more immediate and pressing concerns in the local economy. According to the contact, there is a large disparity between individuals living below the poverty level and those with more financial security. In addition, the housing shortage that existed prior to the pandemic has worsened due to remote workers that relocated from more expensive areas purchasing properties. Investors looking to develop single family homes into Airbnb vacation rentals have further depleted already low housing stock levels.

### **Credit and Community Development Needs and Opportunities**

Examiners determined that affordable housing represents a primary credit need and small business lending represents a secondary credit need in the Coeur d'Alene AA. Information obtained from a community contact and demographic data supports this conclusion. There are opportunities for

financial institutions to focus efforts on providing support for affordable housing initiatives and programs. Banking partners also have opportunities to provide financial education for entrepreneurs looking to identify solutions to funding operations are also needed in this AA.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN COEUR D'ALENE**

### **LENDING TEST**

Lending levels within the Coeur d'Alene AA reflect good responsiveness. The geographic distribution of loans reflects adequate penetration throughout the AA. The distribution of borrowers reflects adequate penetration. GB is a leader in making CD loans in the AA.

#### **Lending Activity**

GB's lending levels reflect good responsiveness to AA credit needs. During the review period, GB originated 1,478 small business loans totaling \$175.4 million, 3,344 home mortgage loans totaling \$980.2 million, and 4 small farm loans totaling \$341 thousand.

In the prior evaluation, the bank originated 351 small business loans totaling \$56.9 million and 1,548 home mortgage loans totaling \$345.6 million. The bank did not originate any small farm loans in the Coeur d'Alene AA at the prior evaluation. The number and dollar amount of the originations for each loan product increased since the prior evaluation. GB's ranking among other lenders also improved for each product reviewed.

Aggregate lending data from 2020 shows a total of 4,393 small business loans were originated by 80 lenders in the AA. GB ranked 1<sup>st</sup> among this group, with 20.4 percent of the total market share. GB ranked 2<sup>nd</sup> among 357 lenders originating home mortgage loans. Peer mortgage data from 2020, shows the bank with a total of 7.5 percent of the 24,093 mortgage loans originated. GB was not ranked among the 10 lenders that originated 49 small farm loans in 2020.

#### **Geographic Distribution**

The bank's geographic distribution of loans reflects adequate penetration throughout the AA. Good small business and adequate home mortgage lending performance support this conclusion. Since there are no low-income geographies in the Coeur d'Alene AA, the bank's performance was based upon the record of lending in moderate income CTs. The bank originated a nominal amount of small farm loans in the AA; therefore, small farm lending is not presented.

#### *Small Business*

The geographic distribution of small business loans reflects good penetration throughout the AA. The bank's small business lending to moderate-income geographies was slightly above the data reported by aggregate lenders and demographics during the review period for 2019 and 2020. In 2021, GB's performance mirrored demographic data.

### *Home Mortgage*

The geographic distribution of home mortgage loans reflects adequate penetration throughout the AA. GB's home mortgage lending in moderate-income areas was commensurate with aggregate performance and slightly above demographics throughout the review period.

### **Borrower Profile**

The distribution of borrowers reflects adequate penetration among retail customers of different income levels and businesses of different sizes. Good small business and adequate home mortgage lending performance support this conclusion.

### *Small Business*

The distribution of borrowers reflects good penetration to businesses with GARs of \$1 million or less. GB's lending to small businesses was below D&B data throughout the evaluation period, but above aggregate performance in 2019. The bank's performance trended upward and reflected significant improvement in 2020 and 2021.

### *Home Mortgage*

The distribution of borrowers reflects adequate penetration to LMI borrowers. GB's lending to low- and moderate-income borrowers was below demographic data, but commensurate with aggregate lenders throughout the evaluation period.

### **Community Development Loans**

GB is a leader in making CD loans in the Coeur d'Alene AA where the bank originated 19 CD loans totaling \$96.7 million. This performance represents a significant increase since the last examination, when GB made only 1 CD loans totaling \$7.6 million in the Coeur d'Alene AA. GB contributed its loans to all four CD types; however, the large majority of its loan activity derives from a few loans targeting revitalization or stabilization.

GB's CD loan performance in the Coeur d'Alene AA is consistent with the bank's overall performance in the State of Idaho. The following table presents the bank's CD loans in the Coeur d'Alene AA by year and CD purpose.

<b>Community Development Lending – Coeur d'Alene AA</b>										
<b>Activity Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
2019	-	-	-	-	2	3,155	-	-	2	3,155
2020	1	113	4	891	-	-	2	28,639	7	29,643
2021	1	4,000	5	3,073	-	-	-	-	6	7,073
YTD 2022	1	4,000	-	-	2	2,865	1	50,000	4	56,865
<b>Total</b>	<b>3</b>	<b>8,113</b>	<b>9</b>	<b>3,964</b>	<b>4</b>	<b>6,021</b>	<b>3</b>	<b>78,639</b>	<b>19</b>	<b>96,737</b>
<i>Source: Bank Data</i>										

Notable examples of GB's CD loans in the Coeur d'Alene AA include:

- In 2022, GB originated a \$50.0 million revitalization or stabilization loan to a community hospital located in a moderate-income census tract in the AA that provides essential medical services for the local population, including LMI populations and Medicaid recipients.
- In 2021 and 2022, GB originated a \$4.0 million loan to an affordable housing organization that identifies and provides initial funding for LIHTC opportunities in the AA.
- In 2019, GB originated a \$1.4 million economic development loan under the SBA 504 program for a new facility for a small retailing business in the AA. The loan will facilitate the permanent creation of 12 new positions for LMI workers.

## **INVESTMENT TEST**

GB has a significant level of qualified CD investments and grants in the Coeur d'Alene AA, exhibits adequate responsiveness to credit and CD needs, and occasionally uses innovative and complex investments to support CD initiatives.

### **Investment and Grant Activity**

The institution has a significant level of qualified CD investments, grants, and donations, particularly those not routinely provided by private investors, occasionally in a leadership position. During the evaluation period, GB made \$1.5 million in new investments, continued to hold \$54 thousand in prior period investments, and provided \$361 thousand in donations that directly benefited the AA.

This level represents a decline from the prior evaluation when GB's qualified investments and donations totaled \$5.0 million. However; while investment opportunities were more difficult to obtain, the bank increased its donations and provision of financial education throughout the review period. The number of activities increased significantly to 80 over the last examination's total of 22. GB spread its grant and donation activity among all the CD purposes, and its one impactful investment during the period targeted affordable housing, a primary CD need identified in the AA. The following table details the bank's investments and donations by year and CD purpose.

Qualified Investments – Coeur d’Alene MSA										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	3	54	-	-	-	-	-	-	3	54
2019	-	-	-	-	-	-	-	-	-	-
2020	1	1,548	-	-	-	-	-	-	1	1,548
2021	-	-	-	-	-	-	-	-	-	-
YTD 2022	-	-	-	-	-	-	-	-	-	-
<b>Subtotal</b>	<b>4</b>	<b>1,602</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>4</b>	<b>1,602</b>
Qualified Grants & Donations	4	10	68	246	1	5	3	100	76	361
<b>Total</b>	<b>8</b>	<b>1,612</b>	<b>68</b>	<b>246</b>	<b>1</b>	<b>5</b>	<b>3</b>	<b>100</b>	<b>80</b>	<b>1,963</b>
<i>Source: Bank Data</i>										

The following are notable examples of investments and donations made in the Coeur d’Alene AA.

- In 2020, GB invested in a \$1.5 million LIHTC investment that provided 72 units of affordable housing to LMI individuals and families in the AA.
- From 2019 to 2022, GB maintained three mortgage-backed securities on its books totaling \$54 thousand where the underlying mortgages are considered affordable housing loans to LMI borrowers in the AA.
- From 2019 to 2022, GB provided sponsorships for students from primarily LMI schools within the AA for the Everfi financial education course totaling \$13 thousand.

### **Responsiveness to Credit and Community Development Needs**

GB exhibits adequate responsiveness to credit and CD needs. Although the bank only made one new investment during the review period, donation activity increased to demonstrate adequate responsiveness to community needs. All in all, investment activity targeting affordable housing, the identified need in the community, totaled \$1.6 million.

### **Community Development Initiatives**

GB occasionally uses innovative or complex investments in the Coeur d’Alene AA to support CD initiatives. In this AA, the bank funded one LIHTC investment totaling \$1.5 million. Refer to the bank-wide Community Development Initiatives for further details on the bank’s initiatives.

### **SERVICE TEST**

Delivery systems are reasonably accessible to essentially all portions of the Coeur d’Alene AA. Services, including business hours, do not vary in a way that inconveniences certain portions of the AA, particularly LMI geographies and/or individuals. GB provides a relatively high level of CD



services in the AA. GB did not open or close any branches in the Coeur d'Alene AA; therefore, this criterion did not affect the AA's Service Test conclusions.

### **Accessibility of Delivery Systems**

Delivery systems are reasonably accessible to essentially all portions of the institution's AA. The AA includes no low-income geographies. The bank has four branches located in the AA. One branch or 25.0 percent is located in a moderate-income CT, which trails the 31.4 percent of branches operated in these geographies by other institutions. GB's distribution of branches slightly trails the percentage of businesses operating in moderate-income geographies CTs, but exceeds the percentage of households and families located in these geographies. The remaining three branches are located in middle-income CTs.

### **Changes in Branch Locations**

The bank did not open or close any branches in the Coeur d'Alene AA during the evaluation period; as such, this criterion did not affect conclusions for the AA.

### **Reasonableness of Business Hours and Services**

Services, including business hours, do not vary in a way that inconveniences certain portions of the AA, particularly LMI geographies and/or individuals. Products, services, and business hours are virtually the same in the Coeur d'Alene AA as those discussed in the Service Test portion for the State of Idaho, with the exception of one branch located in Coeur d'Alene that does not offer Saturday hours. The branch is located approximately two miles from another branch that is open on Saturdays.

### **Community Development Services**

The bank provides a relatively high level of CD services in the Coeur d'Alene AA. During the evaluation period, bank staff provided 921 hours of qualified CD services. Service hours decreased slightly from the prior evaluation, when GB employees provided 1,261 hours to the AA. The significant majority of services provided by the bank targeted community services. Although services decreased since the previous examination, pandemic-related shut downs in 2020 and 2021 created significant challenges to performing in-person services.

The following table details the institution's CD services for each year of the evaluation period by year and type of service provided.

<b>Community Development Services – Coeur d’Alene MSA</b>					
<b>Activity Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b># Hours</b>	<b># Hours</b>	<b># Hours</b>	<b># Hours</b>	<b># Hours</b>
2019	-	202	4	-	<b>206</b>
2020	6	310	19	-	<b>335</b>
2021	10	233	11	-	<b>254</b>
YTD 2022	5	117	4	-	<b>126</b>
<b>Total</b>	<b>21</b>	<b>862</b>	<b>38</b>	<b>-</b>	<b>921</b>
<i>Source: Bank Data</i>					

Notable examples of CD services in the Coeur d’Alene AA include:

- From 2020 to 2022, a GB manager contributed 19 hours serving on the Board for a local community services organization in the AA that provides services and shelter to LMI children that have experienced neglect or abuse.
- From 2019 to 2022, nine GB employees have contributed 27 service hours teaching financial literacy classes at two elementary schools that consists primarily of LMI students in the AA.
- From 2019 to 2022, a GB Executive contributed 39 hours supporting economic development by serving on the Board of a local CDFI in the AA that provides financing for small businesses and targets affordable housing projects for LMI populations.

## OTHER ASSESSMENT AREAS – Limited-Scope Review

### CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED-SCOPE ASSESSMENT AREAS

The following table summarizes performance in each limited-scope AA as compared to performance in the State of Idaho AA in which full-scope procedures were conducted. The conclusions are based on a review of available facts and data, aggregate lending comparisons and demographic information. The conclusions from the areas reviewed using limited-scope procedures did not impact or alter the institution's overall performance rating.

Assessment Area	Lending Test	Investment Test	Service Test
Boise City	Consistent	Consistent	Consistent
Non-MSA	Exceeds	Consistent	Below
Idaho Falls-Rexburg-Blackfoot	Consistent	Consistent	Below
Pocatello	Consistent	Below	Exceeds

The following facts and data support the conclusions for each limited-scope AA. Also included are details regarding the number and dollar volume of small business, home mortgage, small farm, and community development loans originated during the review period; qualified investments (new and prior period) and donations during the review period; and community development services for the review period. Unless otherwise noted, branch distribution and service hours are consistent with Idaho overall, and products, services, and alternative delivery systems are discussed at the institution level. Additional information is in the Limited-Scope Assessment Areas Appendices.

#### Boise City

GB operates seven branches in the AA: two in low-, two in moderate-, two in middle- and one in an upper-income tract. The institution did not open or close any branches in this AA since the prior evaluation. The following table details the bank's activities in this AA.

Activity	#	\$
Small Business Loans	1,574	172,333
Home Mortgage Loans	1,145	240,209
Small Farm Loans	16	1,215
Community Development Loans	23	44,560
Investments (New)	8	21,247
Investments (Prior Period)	8	4,583
Donations	93	405
CD Services	585	-
<i>Source: Bank Data</i>		

#### Non-MSA

GB operates six branches in the Idaho Non-MSA AA, including four branches in middle-income and two branches in upper-income tracts. The bank did not open or close any branches in this AA since the prior evaluation. The following table details the bank's activities in this AA.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	1,408	94,788
Home Mortgage Loans	1,766	464,420
Small Farm Loans	24	2,926
Community Development Loans	7	11,417
Investments (New)	1	4,000
Investments (Prior Period)	1	659
Donations	56	167
CD Services	267	-
<i>Source: Bank Data</i>		

### **Idaho Falls-Rexburg-Blackfoot**

GB operates two branches in the AA, including one branch in a moderate-income tract and one branch in a middle-income tract. The institution did not open or close any branches in this AA since the prior evaluation. The following table details the bank's activities in this AA.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	716	115,572
Home Mortgage Loans	741	190,094
Small Farm Loans	19	1,790
Community Development Loans	6	17,533
Investments (New)	1	3,000
Investments (Prior Period)	1	7,903
Donations	39	66
CD Services	55	-
<i>Source: Bank Data</i>		

### **Pocatello**

GB operates three full-service branches located in middle-income CTs in the AA. The bank did not open or close any branches in this AA since the prior evaluation. The following table details the bank's activities in this AA.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	605	69,462
Home Mortgage Loans	1,194	246,591
Small Farm Loans	18	1,345
Community Development Loans	10	9,968
Investments (New)	1	500
Investments (Prior Period)	1	67
Donations	67	126
CD Services	979	-
<i>Source: Bank Data</i>		

## WYOMING

### CRA RATING FOR WYOMING: SATISFACTORY

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN WYOMING

GB operates within two AAs in the State of Wyoming; see the following table. In 2021, the bank expanded into Natrona County, which represents the Casper AA. Refer to individual AAs for key demographic, economic information, and a summary of applicable changes specific to each.

Description of Assessment Areas		
Assessment Area	Counties in Assessment Area	# of CTs
Wyoming Non-MSA	Goshen, Platte, Big Horn, Lincoln, Park, Sheridan, Sublette, Sweetwater, Uinta	39
Casper	Natrona	18
Source: Bank Data		

### SCOPE OF EVALUATION – WYOMING

Consistent with the overall Scope of Evaluation, home mortgage, small business, and small farm loan products were analyzed for both Wyoming AAs, with the greatest consideration given to home mortgage and small business loans.

Based on the lending activity, deposit volume, and branch distribution in the following table, the Wyoming Non-MSA AA was evaluated using full-scope examination procedures and carries greater weight in determining ratings for the State of Wyoming. The Casper AA was evaluated using limited-scope examination procedures.

Assessment Area Breakdown of Loans, Deposits, and Branches						
Assessment Area	Loans		Deposits		Branches	
	\$(000s)	% Bank Total	\$(000s)	% Bank Total	#	% Bank Total
Wyoming Non-MSA	832,627	6.8	1,333,354	7.9	16	8.4
Casper	88,888	0.7	65,950	0.4	1	0.5
<b>Wyoming</b>	<b>921,515</b>	<b>7.5</b>	<b>1,399,304</b>	<b>8.3</b>	<b>17</b>	<b>8.9</b>
Source: Bank Records, FDIC Summary of Deposits (6/30/2021)						

## CONCLUSIONS ON PERFORMANCE CRITERIA IN WYOMING

### LENDING TEST

GB is rated “High Satisfactory” in the Lending Test in the State of Wyoming. The bank’s performance in each of the Wyoming AAs was consistent with this conclusion.

#### Lending Activity

GB’s lending levels reflect excellent responsiveness to AA credit needs. Refer to each Wyoming AA analysis for details.

#### Geographic Distribution

The geographic distribution of loans reflects good penetration throughout the Wyoming AAs.

#### Borrower Profile

The distribution of borrowers in Wyoming reflects good penetration. GB’s performance in the Wyoming Non-MSA AA was consistent with this conclusion, while performance in the Casper AA was below that of the overall performance conclusion.

#### Community Development Loans

GB is a leader in making CD loans in the Wyoming AAs. The bank originated 32 CD loans totaling \$64.3 million in the State of Wyoming. This performance represents a significant increase since the last examination, when GB made 10 CD loans totaling \$40.9 million. In addition, GB targeted 8 loans totaling \$20.6 million towards affordable housing, an identified in the community.

Performance was consistent throughout the Wyoming AAs. The Wyoming Non-MSA AA weighed most heavily while the Casper AA had minimal impact while forming conclusions. The following table presents the bank’s CD loans in the State of Wyoming by year and CD purpose. Refer to each individual AA for specific details and notable examples.

Community Development Lending – State of Wyoming										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2019	1	1,950	-	-	-	-	1	3,500	2	5,450
2020	2	29	7	772	1	870	4	227	14	1,897
2021	4	18,615	6	2,173	2	12,607	2	7,640	14	41,035
YTD 2022	1	15	-	-	-	-	1	15,903	2	15,918
<b>Total</b>	<b>8</b>	<b>20,609</b>	<b>13</b>	<b>2,945</b>	<b>3</b>	<b>13,477</b>	<b>8</b>	<b>27,270</b>	<b>32</b>	<b>64,301</b>
<i>Source: Bank Data</i>										

## INVESTMENT TEST

GB is rated “Outstanding” in the Investment Test in the State of Wyoming. The bank’s performance in each of the Wyoming AAs was consistent with this conclusion.

### **Investment and Grant Activity**

The bank has an excellent level of qualified CD investments and grants throughout the Wyoming AAs, particularly those not routinely provided by private investors, often in a leadership position. GB reported a total of \$40.5 million in total qualified investments and grants. This total includes \$301 thousand in grants or donations and approximately \$6.8 million in prior period investments.

This represents a significant increase from the prior evaluation, when GB’s qualified investments and donations totaled only \$7.8 million. The significant majority of GB’s qualified investments and grants or donations also targeted affordable housing, an identified CD need for the AAs. The following table details the bank’s qualified investments, grants, and donations by year and CD purpose.

Qualified Investments – State of Wyoming										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	3	4,217	-	-	1	500	1	2,051	5	6,768
2019	2	6,200	-	-	1	500	-	-	3	6,700
2020	6	9,523	-	-	-	-	-	-	6	9,523
2021	2	17,226	-	-	-	-	-	-	2	17,226
YTD 2022	-	-	-	-	-	-	-	-	-	-
<b>Subtotal</b>	<b>13</b>	<b>37,166</b>	<b>-</b>	<b>-</b>	<b>2</b>	<b>1,000</b>	<b>1</b>	<b>2,051</b>	<b>16</b>	<b>40,217</b>
Qualified Grants & Donations	3	6	161	255	5	4	16	36	185	301
<b>Total</b>	<b>16</b>	<b>37,172</b>	<b>161</b>	<b>255</b>	<b>7</b>	<b>1,004</b>	<b>17</b>	<b>2,087</b>	<b>201</b>	<b>40,518</b>
<i>Source: Bank Data</i>										

Included in the above table from 2019 is a regional \$5.2 million affordable housing bond purchase supporting 112 affordable units for LMI renters in an area outside the bank’s Wyoming AAs.

### **Responsiveness to Credit and Community Development Needs**

GB exhibits excellent responsiveness to credit and CD needs. The bank demonstrated responsiveness to its Wyoming AAs through its focus on funding investments targeting the identified community need of affordable housing. Overall, GB funded \$37.2 million in qualified investments targeted to affordable housing needs.

### **Community Development Initiatives**

GB makes extensive use of innovative and complex investments in the Wyoming AAs to support CD initiatives. In the Wyoming AAs, the bank funded 4 LIHTC investments totaling \$22.3 million and 2 EQ2 investments totaling \$1.0 million. Refer to the bank-wide Community Development Initiatives for further details on the bank's initiatives.

### **SERVICE TEST**

GB is rated "High Satisfactory" in the Service Test in the State of Wyoming. The bank's performance in each of the Wyoming AAs was consistent with this conclusion.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the institution's Wyoming AAs. GB operates 17 full-service branches located throughout 2 AAs. Of these, 1 branch is located in a low-income CT, 3 branches are located in moderate-income CTs, 10 branches are located in middle-income CTs, and 3 branches are located in upper-income CTs. Refer to each full- and limited-scope analysis for additional details regarding accessibility of delivery systems.

### **Changes in Branch Locations**

To the extent changes have been made, the institution's record of opening and closing branches has improved the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the evaluation period, the bank opened a branch in a middle-income geography located in the Wyoming Non-MSA AA, and the bank opened a branch in a low-income geography located in the Casper AA. Refer to each full- and limited-scope analysis for complete details regarding the changes in branch locations.

### **Reasonableness of Business Hours and Services**

Services, including business hours, do not vary in a way that inconveniences certain portions of the AA, particularly LMI geographies and/or individuals. All of the bank's products and services are available at all of the AA branches. Branch locations have similar hours that vary slightly according to AA needs. The branches in this AA are located in rural areas and have little demand for extended weekend banking hours; six of the branches offer Saturday hours. All but three of the branches in the AA provide drive-up service.

### **Community Development Services**

GB provides a relatively high level of CD services in its Wyoming AAs. Bank staff provided 1,593 CD services hours to organizations throughout the review period. The volume of CD service hours in the Wyoming increased 51.1 percent since the previous evaluation where the bank totaled 1,054 service hours.



While employees performed services targeting all four CD areas, the majority of service activity targeted community services for LMI populations. The majority of service hours were provided in the Wyoming Non-MSA AA, which was also weighted heavier in determining conclusions. The following table details the bank's CD services in the Wyoming AAs by year and CD purpose. Refer to each full- and limited-scope analysis for further detail.

<b>Community Development Services – State of Wyoming</b>					
<b>Activity Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b># Hours</b>	<b># Hours</b>	<b># Hours</b>	<b># Hours</b>	<b># Hours</b>
2019	13	142	68	51	<b>274</b>
2020	53	330	241	76	<b>700</b>
2021	40	190	117	62	<b>409</b>
YTD 2022	36	85	68	21	<b>210</b>
<b>Total</b>	<b>142</b>	<b>747</b>	<b>494</b>	<b>210</b>	<b>1,593</b>
<i>Source: Bank Data</i>					

Bank employees provided 21 CD service hours that benefitted a greater regional area within Wyoming that aren't attributable to a specific AA. Notable examples of these services include:

- In 2022, a GB manager contributed 4 hours on the Board of an organization that provides microloans for LMI individuals, particularly women to foster economic development in an area outside the bank's primary AAs.
- In 2019, a GB executive provided 10 hours sitting on the Board of an organization providing community services and education for LMI children and families in need outside the bank's AAs.

## WYOMING NON-MSA – Full-Scope Review

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE WYOMING NON-MSA

The Wyoming Non-MSA AA consists of 39 CTs that comprise the following 22 counties: Goshen, Platte, Big Horn, Lincoln, Park, Sublette, Sweetwater, and Uinta. In 2021, GB’s AA expanded with the addition of Sheridan County.

#### **Economic and Demographic Data**

The AA consists of 5 moderate-, 27 middle-, and 7 upper-income CTs. The AA does not contain any low-income CTs. See the following table for additional demographic information.

Demographic Information of the Assessment Area						
Assessment Area: GB WY Non MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	39	0.0	12.8	69.2	17.9	0.0
Population by Geography	180,830	0.0	15.6	70.2	14.2	0.0
Housing Units by Geography	83,778	0.0	15.2	70.7	14.2	0.0
Owner-Occupied Units by Geography	51,166	0.0	15.5	70.8	13.7	0.0
Occupied Rental Units by Geography	19,049	0.0	16.1	71.4	12.5	0.0
Vacant Units by Geography	13,563	0.0	12.6	69.1	18.3	0.0
Businesses by Geography	18,839	0.0	12.8	79.3	7.9	0.0
Farms by Geography	995	0.0	25.5	68.3	6.1	0.0
Family Distribution by Income Level	47,267	20.5	19.0	22.2	38.4	0.0
Household Distribution by Income Level	70,215	22.9	17.0	18.4	41.8	0.0
Median Family Income Non-MSAs - WY		\$72,833	Median Housing Value			\$201,465
			Median Gross Rent			\$770
			Families Below Poverty Level			7.7%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

The AA contains 12 underserved middle-income CTs. The median family income is low in comparison to median housing values, making it difficult for families to service mortgage debt. A high rate of poverty and high rates of unemployment in some of the counties may also present for home mortgage lenders to originate loans. Significant industries across the Wyoming AA include: healthcare and social assistance; retail trade; educational services; agriculture, forestry, fishing, and hunting; mining, quarrying, and oil and gas extraction; construction; and public administration.

The highest unemployment levels were observed in Sublette, Sweetwater, and Uinta Counties during in 2020. Levels among the various counties varied and rose across the board during the pandemic. Unemployment levels in each AA improved in 2021. The following table illustrates unemployment rates by year for each county in the AA compared to Wyoming and the nation.

<b>Unemployment Rates – Wyoming Non-MSA</b>			
<b>Area</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
	<b>%</b>	<b>%</b>	<b>%</b>
Goshen County	3.8	4.3	3.5
Platte County	3.6	5.0	4.0
Big Horn County	7.5	5.0	4.4
Lincoln County	3.5	5.0	3.8
Park County	4.2	5.4	4.1
Sheridan County	3.7	4.9	4.2
Sublette County	4.7	7.2	5.6
Sweetwater County	4.0	7.3	5.6
Uinta County	4.0	6.3	5.0
Wyoming	3.7	5.8	4.5
National Average	3.7	8.1	5.3
<i>Source: Bureau of Labor Statistics</i>			

### **Competition**

The level of competition for financial services in the AA is moderate. According to the June 30, 2021 Deposit Market Share Report, GB ranked 1<sup>st</sup> out of 19 FDIC-insured institutions competing within the AA, with a total of 24.4 percent of the deposit market share. According to the same data, the bank has 16 out of 71 branches in the AA.

### **Community Contact**

Examiners conducted a community contact with an organization that helps provide support to the local industries to promote economic development and sustainable small businesses. The organization also plays a role in enhancing the growing tourism industry. According to the contact, the mandatory shut downs from the pandemic took a toll on the AA due to the dependence on tourism to drive the local economy. The contact noted that the close proximity of the AA to the Jackson Hole resort area has driven the cost of housing up, limiting the ability of local residents with modest incomes to purchase homes. The contact further stated that the rural economy has hampered small businesses development in the local area.

### **Credit and Community Development Needs and Opportunities**

Examiners determined that affordable housing represents a primary credit need and small business lending represents a secondary credit need in the Wyoming Non-MSA AA. Information obtained from a community contact and demographic data supports this conclusion. There are opportunities for financial institutions to focus efforts on providing support for affordable housing initiatives and

programs. Banking partners also have opportunities to help provide solutions for small businesses seeking funding for operations in this AA.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE WYOMING NON-MSA**

### **LENDING TEST**

GB's lending levels reflect excellent responsiveness to AA credit needs. The geographic distribution of loans reflects good penetration. The distribution of borrowers reflects good penetration among individuals, businesses and farms. GB is a leader in making CD loans in the AA.

#### **Lending Activity**

GB's lending levels reflect excellent responsiveness to AA credit needs. During the review period, GB originated 1,072 small business loans totaling \$89.3 million, 769 home mortgage loans totaling \$153.9 million, and 1,611 small farm loans totaling \$126.1 million.

In the prior evaluation, the bank originated 1,072 small business loans totaling \$89.3 million, 769 home mortgage loans totaling \$153.9 million, and 901 small farm loans totaling \$75.5 million. The institution's lending activity increased from prior evaluation and GB's market share ranking for each product reviewed also improved. GB was ranked 1<sup>st</sup> among all lenders originating small business, home mortgage, and small farm loans.

#### **Geographic Distribution**

The bank's geographic distribution of loans reflects good penetration throughout the AA. Good small business, excellent home mortgage, and good small farm lending performance support this conclusion. Since there are no low-income geographies in the Wyoming Non-MSA, the bank's performance was based upon the record of lending in moderate income CTs.

##### *Small Business*

The geographic distribution of small business loans reflects good penetration throughout the AA. The bank's small business lending to moderate-income geographies was above D&B data and the rates reported by aggregate lenders throughout the evaluation period.

##### *Home Mortgage*

The geographic distribution of home mortgage loans reflects excellent penetration throughout the AA. GB's home mortgage lending in moderate-income areas was well above demographic data and aggregate performance throughout the review period.

##### *Small Farm*

The geographic distribution of small farm loans reflects good penetration throughout the AA. GB's small farm lending in moderate-income areas was slightly above aggregate lending performance and D&B data throughout the review period.

## **Borrower Profile**

The distribution of borrowers reflects good penetration among retail customers of different income levels and businesses and farms of different sizes. Excellent small business, good home mortgage, and excellent small farm lending performance support this conclusion.

### *Small Business*

The distribution of borrowers reflects excellent penetration to businesses with GARs of \$1 million or less. GB's lending to small businesses was significantly higher than the rates reported by aggregate lenders during the evaluation period. The institution's rate was comparable to D&B data in 2019 and surpassed the demographic for 2020 and 2021.

### *Home Mortgage*

The distribution of borrowers reflects good penetration to LMI borrowers. GB's lending to low-income borrowers was below demographic data and slightly above aggregate lenders during the evaluation period. Lending to moderate-income borrowers and moderate-income borrowers was slightly above both of these demographics for the same time period.

### *Small Farm*

The distribution of borrowers reflects excellent penetration to farms with GARs of \$1 million or less. GB's lending to small farms was well above the rates reported by aggregate lenders and comparable to D&B data throughout the evaluation period.

## **Community Development Loans**

GB is a leader in making CD loans in the WY Non-MSA AA where the bank originated 29 CD loans totaling \$49.2 million. This performance represents an increase since the last examination, when GB made 10 CD loans totaling \$40.9 million in the WY Non-MSA AA. A large portion of the bank's efforts centered on revitalization or stabilization activities.

GB's CD loan performance in the WY Non-MSA AA is consistent with the bank's performance in the State of Wyoming. The following table presents the bank's CD loans in the WY Non-MSA AA by year and CD purpose.

<b>Community Development Lending – WY Non-MSA</b>										
<b>Activity Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
2019	1	1,950	-	-	-	-	1	3,500	2	5,450
2020	2	29	7	772	1	870	4	227	14	1,898
2021	2	5,615	6	2,173	2	12,607	1	5,540	11	25,935
YTD 2022	1	15	-	-	-	-	1	15,903	2	15,918
<b>Total</b>	<b>6</b>	<b>7,609</b>	<b>13</b>	<b>2,945</b>	<b>3</b>	<b>13,477</b>	<b>7</b>	<b>25,170</b>	<b>29</b>	<b>49,201</b>
<i>Source: Bank Data</i>										

Notable examples of GB's CD loans in the MT Non-MSA AA include:

- In 2022, GB originated a \$15.9 million revitalization loan to improve the water system which provides for the residents of a designated underserved geography in the AA.
- In 2021, GB originated an \$11.8 million economic development loan to a small health facility which created 32 new jobs for LMI workers in the AA.
- In 2021, GB originated a \$5.6 million LIHTC loan that provided 23 units of affordable housing to LMI individuals and families in the AA.

## **INVESTMENT TEST**

GB has an excellent level of qualified CD investments and grants in the WY Non-MSA AA, exhibits excellent responsiveness to credit and CD needs, and makes extensive use of innovative and complex investments to support CD initiatives.

### **Investment and Grant Activity**

The institution has an excellent level of qualified CD investments, grants, and donations, particularly those not routinely provided by private investors, often in a leadership position. During the evaluation period, GB made \$8.2 million in new investments, continued to hold \$6.8 million in prior period investments, and provided \$272 thousand in donations that directly benefited the AA.

This level represents a significant increase from the prior evaluation when GB's qualified investments and donations totaled only \$7.8 million. In addition, the large majority of GB's investments focused on the provision of affordable housing, a primary CD need identified in the AA. The following table details the bank's investments and donations by year and CD purpose.

<b>Qualified Investments – WY Non-MSA</b>										
<b>Activity Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Prior Period	3	4,217	-	-	1	500	1	2,051	5	6,768
2019	1	1,000	-	-	1	500	-	-	2	1,500
2020	-	-	-	-	-	-	-	-	-	-
2021	1	6,458	-	-	-	-	-	-	1	6,458
YTD 2022	-	-	-	-	-	-	-	-	-	-
<b>Subtotal</b>	<b>5</b>	<b>11,675</b>	<b>-</b>	<b>-</b>	<b>2</b>	<b>1,000</b>	<b>1</b>	<b>2,051</b>	<b>8</b>	<b>14,726</b>
Qualified Grants & Donations	1	4	152	230	5	4	16	36	174	272
<b>Total</b>	<b>6</b>	<b>11,679</b>	<b>152</b>	<b>230</b>	<b>7</b>	<b>1,004</b>	<b>17</b>	<b>2,087</b>	<b>182</b>	<b>14,998</b>
<i>Source: Bank Data</i>										

The following are notable examples of investments and donations made in the WY Non-MSA AA.

- In 2019, GB invested in a \$6.5 million LIHTC investment that provided 24 units of affordable housing to LMI individuals and families in the AA.

- In 2019 and 2022, GB invested a total of \$1.0 million in an economic development CDFI providing community services to LMI populations and low-cost funding to small businesses in the AA.
- From 2019 to 2022, GB provided sponsorships for students from primarily LMI schools within the AA for the Everfi financial education course totaling \$57 thousand.

### **Responsiveness to Credit and Community Development Needs**

GB exhibits excellent responsiveness to credit and CD needs. The bank demonstrated responsiveness to the WY Non-MSA AA through its focus on funding investments targeting the identified community need of affordable housing. Overall, GB funded \$11.7 million in qualified investments targeted to affordable housing needs.

### **Community Development Initiatives**

GB makes extensive use of innovative and complex investments in the WY Non-MSA AA to support CD initiatives. In this AA, the bank funded 3 LIHTC investments totaling \$11.6 million and 2 EQ2 investments totaling \$1.0 million. Refer to the bank-wide Community Development Initiatives for further details on the bank's initiatives.

### **SERVICE TEST**

Delivery systems are accessible to essentially all portions of the Wyoming Non-MSA AA. Services, including business hours, do not vary in a way that inconveniences certain portions of the AA, particularly LMI geographies and/or individuals. GB provides an adequate level of CD services in the AA. To the extent changes have been made, the institution's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI income geographies and/or to LMI individuals.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the institution's AA. The Wyoming non-MSA AA includes no low-income geographies. Of the bank's 16 branches three are located in moderate-income CTs, which slightly trails the percent of branches operated in these geographies by other institutions. The distribution of branches also slightly trails the percentages of families and businesses operating in the AA's moderate-income geographies, but slightly exceeds the percentage of households in moderate-income geographies. GB also has 10 branches located in middle-income geographies, and 3 branches located in upper-income geographies.

### **Changes in Branch Locations**

To the extent changes have been made, the institution's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI income

geographies and/or to LMI individuals. During the evaluation period, the bank opened one branch in a middle-income geography, located in a new country market in the town of Sheridan.

### **Reasonableness of Business Hours and Services**

Services, including business hours, do not vary in a way that inconveniences certain portions of the AA, particularly LMI geographies and/or individuals. All of the bank's products and services are available at all of the AA branches. Branch locations have similar hours that vary slightly according to AA needs. The branches in this AA are located in rural areas and have little demand for extended weekend banking hours; six of the branches offer Saturday hours. All but three of the branches in the AA provide drive-up service.

### **Community Development Services**

The bank provides an adequate level of CD services in the WY Non-MSA AA. During the evaluation period, bank staff provided 1,241 hours of qualified CD services. Service hours increased slightly from the prior evaluation, when GB employees provided 1,054 hours to the AA. The majority of services provided by the bank targeted community services. The following table details the institution's CD services for each year of the evaluation period by year and type of service provided.

<b>Community Development Services – WY Non-MSA</b>					
<b>Activity Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b># Hours</b>	<b># Hours</b>	<b># Hours</b>	<b># Hours</b>	<b># Hours</b>
2019	13	132	68	51	<b>264</b>
2020	25	227	166	76	<b>494</b>
2021	35	133	82	62	<b>312</b>
YTD 2022	34	60	56	21	<b>171</b>
<b>Total</b>	<b>107</b>	<b>552</b>	<b>372</b>	<b>210</b>	<b>1,241</b>
<i>Source: Bank Data</i>					

Notable examples of CD services in the WY Non-MSA AA include:

- From 2019 to 2022, a GB Officer contributed 108 hours serving on the Board for a local health clinic in the AA that provides free medical care to the local LMI residents in need.
- From 2020 to 2022, a GB loan officer contributed 38 hours serving on the Board of a local Habitat for Humanity chapter, which provides affordable housing opportunities for LMI populations in the AA.
- From 2019 to 2020, a GB manager contributed 77 hours serving on the Board of a local non-profit that provides essential community services, educational programs, shelter, and financial assistance to abused individuals and family members within the AA.



## OTHER ASSESSMENT AREAS – Limited-Scope Review

### CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED-SCOPE ASSESSMENT AREAS

The following table summarizes performance the limited-scope AA as compared to performance in the State of Wyoming AA in which full-scope procedures were conducted. The conclusions are based on a review of available facts and data, aggregate lending comparisons and demographic information. The conclusions from the areas reviewed using limited-scope procedures did not impact or alter the institution's overall performance rating.

Assessment Area	Lending Test	Investment Test	Service Test
Casper	Consistent	Consistent	Consistent

The following facts and data support the conclusions for the AA. Also included are details regarding the number and dollar volume of small business, home mortgage, small farm, and community development loans originated during the review period; qualified investments (new and prior period) and donations during the review period; and community development services for the review period. Unless otherwise noted, branch distribution and service hours are consistent with Wyoming overall, and products, services, and alternative delivery systems are discussed at the institution level. Additional information is in the Limited-Scope Assessment Areas Appendices.

#### Casper

GB operates one full-service branches located in a low-income CT. The branch was opened during the evaluation period. The following table details the bank's activities in this AA.

Activity	#	\$
Small Business Loans	290	39,792
Home Mortgage Loans	146	48,165
Small Farm Loans	12	931
Community Development Loans	3	15,100
Investments (New)	7	20,291
Investments (Prior Period)	-	-
Donations	11	28
CD Services	332	--
Source: Bank Data		

## COLORADO

### CRA RATING FOR COLORADO: SATISFACTORY

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN COLORADO

GB operates within five AAs in the State of Colorado; see the following table. The institution has not made any changes to the AA since the prior evaluation. Refer to individual AAs for key demographic and economic information.

Description of Assessment Areas		
Assessment Area	Counties in Assessment Area	# of CTs
Colorado Non-MSA	Archuleta, Chaffee, La Plata, Moffat, Rio Blanco, Routt	33
Colorado Springs	El Paso	130
Denver-Aurora	Adams, Arapahoe, Denver, Douglas, Jefferson	587
Grand Junction	Mesa	29
Pueblo-Canon City	Pueblo, Fremont	69
Source: Bank Data		

### SCOPE OF EVALUATION – COLORADO

Consistent with the overall Scope of Evaluation, home mortgage, small business, and small farm loan products were analyzed for the Colorado AAs, with the greatest consideration given to home mortgage and small business loans.

Based on the lending activity, deposit volume, and branch distribution in the following table, the Colorado Non-MSA AA was evaluated using full-scope examination procedures and carries greater weight in determining ratings for the State of Colorado. The remaining AAs were evaluated using limited-scope examination procedures.

Assessment Area Breakdown of Loans, Deposits, and Branches						
Assessment Area	Loans		Deposits		Branches	
	\$(000s)	% Bank Total	\$(000s)	% Bank Total	#	% Bank Total
Colorado Non-MSA	256,531	2.1	835,247	5.0	13	6.8
Denver-Aurora	379,427	3.0	339,525	2.0	3	1.6
Pueblo-Canon City	137,118	1.1	445,133	2.6	4	2.1
Grand Junction	119,322	1.0	157,342	0.9	4	2.1
Colorado Springs	96,573	0.8	55,105	0.3	1	0.5
<b>Colorado</b>	<b>988,971</b>	<b>8.0</b>	<b>1,832,352</b>	<b>10.8</b>	<b>25</b>	<b>13.1</b>
<i>Source: Bank Records, FDIC Summary of Deposits (6/30/2021)</i>						

## CONCLUSIONS ON PERFORMANCE CRITERIA IN COLORADO

### LENDING TEST

GB is rated “High Satisfactory” in the Lending Test in the State of Colorado. The bank’s performance in the Colorado AAs was consistent with this conclusion, with the exception of the Denver-Aurora and Grand Junction AAs, where performance was below that of the overall performance conclusion.

#### Lending Activity

GB’s lending levels reflect good responsiveness to AA credit needs. Refer to each Colorado AA analysis for details.

#### Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the Colorado AAs. The bank’s performance in the Colorado Springs AA was above that of the overall performance conclusion.

#### Borrower Profile

The distribution of borrowers in Colorado reflects good penetration. The Bank’s performance in each of the Colorado AAs was consistent with this conclusion, with the exception of the Colorado Non-MSA, where the performance was above the overall performance conclusion and the Grand Junction AA, where the performance was below that of the overall performance conclusion.

#### Community Development Loans

GB is a leader in making CD loans in the Colorado AAs. The bank originated 37 CD loans totaling \$122.7 million in the State of Colorado, which includes 3 regional CD loans totaling \$13.2 million during the evaluation period. This performance represents an increase since the last examination, when GB made 19 CD loans totaling \$91.6 million. In addition, GB primarily targeted affordable housing opportunities through the review period with 13 loans totaling \$56.2 million.

Performance varied somewhat throughout the Colorado AAs. The CO Non-MSA and Denver AAs primarily support this conclusion while performance in the Pueblo, Grand Junction, and Colorado Springs AAs was below that of the overall performance conclusion. The CO Non-MSA AA weighed most heavily in forming conclusions with the Denver and Pueblo AAs being the next most heavily weighted. The following table presents the bank's CD loans in the State of Colorado by year and CD purpose. Refer to each individual AA for specific details and notable examples.

Community Development Lending – State of Colorado										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2019	3	6,601	-	-	-	-	2	4,276	5	10,877
2020	4	19,149	6	10,434	4	9,183	3	8,163	17	46,928
2021	3	17,465	1	110	4	14,033	1	11,923	9	43,531
YTD 2022	3	12,999	1	2,160	2	6,201	-	-	6	21,359
<b>Total</b>	<b>13</b>	<b>56,213</b>	<b>8</b>	<b>12,704</b>	<b>10</b>	<b>29,416</b>	<b>6</b>	<b>24,362</b>	<b>37</b>	<b>122,695</b>
<i>Source: Bank Data</i>										

Notable examples of GB's CD loans in Colorado that aren't attributable to a specific AA include:

- In 2021, GB originated a \$6.0 million LIHTC loan that provided 42 units of affordable housing in an area outside the bank's AAs.
- In 2019, GB originated a \$4.2 million affordable housing loan that provided 50 units of rent-restricted housing in a moderate-income geography located outside the bank's AAs.
- In 2021, GB originated a \$3.0 million economic development loan through the SBA 504 program that provided working capital to a small medical facility, retaining 9 jobs and creating 4 new jobs in an area outside the bank's AAs.

## INVESTMENT TEST

GB is rated "Outstanding" in the Investment Test in the State of Colorado. The bank's performance in the Colorado AAs varied somewhat. The Denver, Pueblo, and Colorado Springs AAs primarily contributed to this conclusion, while the Colorado Non-MSA and Grand Junction AAs displayed performance that was below the overall conclusion.

### Investment and Grant Activity

The bank has an excellent level of qualified CD investments and grants throughout the Colorado AAs, particularly those not routinely provided by private investors, often in a leadership position. GB reported a total of \$184.7 million in total qualified investments and grants. This total includes \$440 thousand in grants or donations and nearly \$64.7 million in prior period investments.

This level represents a significant increase from the prior evaluation, when GB's qualified investments and donations totaled approximately \$78.7 million. In addition, essentially all of GB's

qualified investments targeted affordable housing, an identified CD need for the AAs. The following table details the bank’s qualified investments, grants, and donations by year and CD purpose.

Qualified Investments – State of Colorado										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	17	64,698	-	-	-	-	-	-	17	64,698
2019	5	23,572	-	-	-	-	-	-	5	23,572
2020	9	67,375	-	-	-	-	-	-	9	67,375
2021	1	2,500	-	-	-	-	-	-	1	2,500
YTD 2022	3	26,160	-	-	-	-	-	-	3	26,160
<b>Subtotal</b>	<b>35</b>	<b>184,305</b>	-	-	-	-	-	-	<b>35</b>	<b>184,305</b>
Qualified Grants & Donations	14	64	123	278	10	45	18	53	165	440
<b>Total</b>	<b>49</b>	<b>184,369</b>	<b>123</b>	<b>278</b>	<b>10</b>	<b>45</b>	<b>18</b>	<b>53</b>	<b>201</b>	<b>184,745</b>
<i>Source: Bank Data</i>										

In 2019, GB reported a \$3.2 million in a regional affordable housing investment consisting of a mortgage-backed security with the underlying mortgage targeting a LMI loan within CO but outside the bank’s AAs. In addition, GB reported three donations targeting community services within the review period to organizations outside the bank’s AAs. One donation in 2020 totaled \$6 thousand to a local non-profit organization providing food to LMI individuals and families. The other two donations occurred in 2020 and 2021, totaled \$2.6 thousand to a non-profit providing community services to LMI children in need.

### **Responsiveness to Credit and Community Development Needs**

GB exhibits excellent responsiveness to credit and CD needs. The bank demonstrated responsiveness to its Colorado AAs through its focus on funding investments targeting the identified community need of affordable housing. Overall, GB funded \$184.4 million in qualified investments targeted to affordable housing needs.

### **Community Development Initiatives**

GB makes significant use of innovative and complex investments in the Colorado AAs to support CD initiatives. In the Colorado AAs, the bank funded 9 LIHTC investments totaling \$26.6 million. Refer to the bank-wide Community Development Initiatives for further details on the bank’s initiatives.

### **SERVICE TEST**

GB is rated “High Satisfactory” in the Service Test in the State of Colorado. The bank’s performance in the Colorado AAs was consistent with this conclusion, with the exception of the Colorado Springs AA, where performance was below that of the overall conclusion.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the institution's Colorado AAs. GB operates 25 full-service branches located throughout the bank's 6 AAs. Of the 25 branches, 6 are located in moderate-income CTs, 10 are located in middle-income CTs, and 9 branches are located in upper-income CTs. Four of the total branches are located in underserved, middle-income geographies. Refer to each full- and limited-scope analysis for details.

### **Changes in Branch Locations**

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the evaluation period, the bank opened one new branch in the Denver-Aurora AA. Refer to each full- and limited-scope analysis for complete details regarding the changes in branch locations.

### **Reasonableness of Business Hours and Services**

Services, including business hours, do not vary in a way that inconveniences certain portions of the Colorado AAs, particularly LMI geographies and/or individuals. All of the bank's products and services are available at all of the branches in the AA. Branch locations have virtually the same hours that vary slightly according to AA needs. Saturday hours are offered at 16 of the 25 branch locations and 18 of the 25 branches provide drive-up service. Refer to each full- and limited-scope analysis for additional details.

### **Community Development Services**

GB provides a relatively high level of CD services in its Colorado AAs. Bank staff provided 2,375 CD services hours throughout the review period. The volume of CD service hours in the state increased 196.5 percent since the previous evaluation where the bank totaled 801 service hours.

The majority of service activity targeted community services for LMI populations. A substantial majority of service hours were provided in the CO Non-MSA, Denver, and Pueblo AAs, which contributed the most weight towards CD conclusions for the state. The following table details the bank's CD services in the Colorado AAs by year and CD purpose. Refer to each full- and limited-scope analysis for further detail.

<b>Community Development Services – State of Colorado</b>					
<b>Activity Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b># Hours</b>	<b># Hours</b>	<b># Hours</b>	<b># Hours</b>	<b># Hours</b>
2019	94	296	27	8	<b>425</b>
2020	128	490	117	13	<b>748</b>
2021	130	566	75	24	<b>795</b>
YTD 2022	53	242	60	52	<b>407</b>
<b>Total</b>	<b>405</b>	<b>1,594</b>	<b>279</b>	<b>97</b>	<b>2,375</b>
<i>Source: Bank Data</i>					

In 2021 and 2022, a bank loan officer provided 12 CD service hours that benefitted a greater regional area within Colorado that aren't attributable to a specific AA. This loan officer served on the Board of a community services organization that provides food to LMI individuals and families in an area outside the bank's AA.

## **COLORADO NON-MSA – Full-Scope Review**

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE COLORADO NON-MSA**

The Colorado Non-MSA AA consists of 33 CTs that comprise the following 6 counties: Archuleta, La Plata, Moffat, Rio Blanco, Routt, and Chaffee. There have been no changes to the AA since the prior evaluation.

#### **Economic and Demographic Data**

The AA consists of 1 moderate-, 18 middle-, and 14 upper-income CTs. The AA does not contain any low-income CTs. See the following table for additional demographic information.

Demographic Information of the Assessment Area						
Assessment Area: GB CO Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	33	0.0	3.0	54.5	42.4	0.0
Population by Geography	127,100	0.0	2.2	49.3	48.5	0.0
Housing Units by Geography	71,396	0.0	1.9	49.2	48.9	0.0
Owner-Occupied Units by Geography	35,760	0.0	2.4	48.4	49.2	0.0
Occupied Rental Units by Geography	15,742	0.0	2.6	52.4	45.1	0.0
Vacant Units by Geography	19,894	0.0	0.6	48.0	51.4	0.0
Businesses by Geography	22,822	0.0	3.4	48.2	48.4	0.0
Farms by Geography	1,015	0.0	1.3	50.2	48.5	0.0
Family Distribution by Income Level	32,357	15.2	15.9	20.6	48.4	0.0
Household Distribution by Income Level	51,502	19.8	14.7	17.0	48.4	0.0
Median Family Income Non-MSAs - CO		\$60,701	Median Housing Value			\$316,835
			Median Gross Rent			\$976
			Families Below Poverty Level			6.5%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

The AA contains 12 underserved middle-income CTs. The median family income is extremely low in comparison to median housing values making it difficult for families to service mortgage debt. Significant industries across the Colorado AA include: social services; retail and wholesale trade; agriculture, finance and insurance, construction; and transportation.

The highest unemployment levels were observed in Archuleta and Routt Counties during 2020. Levels among the various counties varied and rose during the pandemic. Unemployment levels in each AA improved in 2021. The following table illustrates unemployment rates by year for each county in the AA compared to Colorado and the nation.



Unemployment Rates – Colorado Non-MSA			
Area	2019	2020	2021
	%	%	%
Archuleta County	3.0	7.2	5.8
Chaffee County	2.3	6.0	4.5
La Plata County	2.4	6.6	5.2
Moffat County	3.2	5.8	4.8
Rio Blanco County	3.5	5.2	5.5
Routt County	2.1	7.5	4.2
Colorado	2.6	6.9	5.4
National Average	3.7	8.1	5.3
<i>Source: Bureau of Labor Statistics</i>			

### **Competition**

There is a moderate level of competition for financial services in the AA. According to the June 30, 2021 Deposit Market Share Report, GB ranked 2<sup>nd</sup> of 17 FDIC-insured institutions competing within the AA, with a total of 15.2 percent of the deposit market share. According to the same data, the bank has 10 out of 55 branches in the AA.

### **Community Contact**

Examiners reviewed an existing community contact with an organization that operates and manages public housing programs, specifically those which are tailored to the needs of low-income persons. The contact noted that the economy in the area has shifted its reliance on agriculture and mining related jobs to the service industry. An increased interest in tourism has resulted in most full-time residents being employed in hospitality, restaurant, and recreational occupations. The area's economy initially suffered during the pandemic as a result of domestic and international travel restrictions; however, the contact noted the economy has returned to operating at pre-pandemic levels. The contact stated that the area is a popular destination for vacation properties for part-time residents which has increased the price of homes substantially, making it difficult for full-time residents working lower-wage jobs to find affordable housing. According to the contact, there is a waiting list for affordable housing units for lower-income residents.

### **Credit and Community Development Needs and Opportunities**

Examiners determined that affordable housing represents a primary credit need and small business lending represents a secondary credit need in the AA. Information obtained from a community contact and demographic data supports this conclusion. There are opportunities for financial institutions to focus efforts on providing support for affordable housing initiatives and programs. Banking partners also have opportunities to provide financial education for entrepreneurs looking to obtain capital to fund start-ups and for funding operations are also needed in this AA.

## CONCLUSIONS ON PERFORMANCE CRITERIA IN THE COLORADO NON-MSA

### LENDING TEST

GB's lending levels reflect good responsiveness to AA credit needs. The geographic distribution of loans reflects adequate penetration. The distribution of borrowers reflects good penetration among individuals and businesses. GB is a leader in making CD loans in the AA.

#### Lending Activity

GB's lending levels reflect good responsiveness to AA credit needs. During the review period, GB originated 1,316 small business loans totaling \$121.9 million, 509 home mortgage loans totaling \$123.4 million, and 113 small farm loans totaling \$11.0 million. In the prior evaluation, the bank originated 353 small business loans totaling \$38.7 million, 148 home mortgage loans totaling \$44.2 million, and 85 small farm loans totaling \$7.7 million.

Aggregate lending data from 2020 shows a total of 5,685 small business loans were originated by 107 lenders in the AA. GB ranked 2<sup>nd</sup> among this group, with 11.4 percent of the total market share. GB also ranked 11<sup>th</sup> among 528 lenders originating home mortgage loans. Peer mortgage data from 2020, shows the bank with a total of 1.8 percent of the 15,894 mortgage loans originated. The bank ranked 1<sup>st</sup> among 22 lenders that originated a total of 155 small farm loans in the AA.

#### Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the AA. GB's adequate small business and home mortgage lending performance support this conclusion. Poor performance of small farm lending did not impact the overall conclusions. Lending analysis was limited to GB's performance in moderate-income CTs, since there are no low-income geographies in the AA.

##### *Small Business*

The geographic distribution of small business loans reflects adequate penetration throughout the AA. The bank's small business lending to moderate-income geographies was comparable to D&B data and the rates reported by aggregate lenders throughout the evaluation period.

##### *Home Mortgage*

The geographic distribution of home mortgage loans reflects adequate penetration throughout the AA. GB's home mortgage lending in moderate-income areas was comparable to demographic data and aggregate performance throughout the review period.

##### *Small Farm*

The geographic distribution of small farm loans reflects poor penetration throughout the AA. GB's did not originate any small farm loans in moderate-income CTs during the evaluation period; however, D&B data illustrates very limited opportunities to lend as only a small percentage of area businesses are located in moderate-income CTs. Furthermore, data reported by aggregate lenders

also supports a low demand for credit in these geographies as a very small percentage of loans were originated in moderate income CTs. GB's performance of small farm lending in the Colorado Non-MSA did not impact the overall conclusions for the Lending Test.

### **Borrower Profile**

The distribution of borrowers reflects excellent penetration among retail customers of different income levels and businesses and farms of different sizes. Excellent lending performance for each product reviewed supports this conclusion.

#### *Small Business*

The distribution of borrowers reflects excellent penetration to businesses with GARs of \$1 million or less. GB's lending to small businesses was substantially higher than the rates reported by aggregate lenders in 2019 and 2021. The institution's performance remained consistent in 2021.

#### *Home Mortgage*

The distribution of borrowers reflects excellent penetration to LMI borrowers. GB's lending to low-income borrowers was below demographic data; however, the institution's performance was almost double the rate reported by aggregate lenders and trended upward during the evaluation period. Lending to moderate-income borrowers was also strong. GB's performance was above aggregate and comparable to demographic data.

#### *Small Farm*

The distribution of borrowers reflects excellent penetration to farms with GARs of \$1 million or less. GB's lending to small farms was well above the rates reported by aggregate lenders. The institution made all but one loan to farms with GARs of \$1 million or less during the entire review period.

### **Community Development Loans**

GB is a leader in making CD loans in the AA where the bank originated 8 CD loans totaling \$41.1 million. This performance represents a significant increase since the last examination, when GB made only 1 CD loans totaling \$439 thousand in the Colorado Non-MSA AA. GB primarily targeted affordable housing in the AA, an identified need in the community, with 3 loans totaling \$21.3 million.

GB's CD loan performance in the Colorado Non-MSA AA is consistent with the bank's performance in the State of Colorado. The following table presents the bank's CD loans in the AA by year and CD purpose.

Community Development Lending – CO Non-MSA										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2019	-	-	-	-	-	-	-	-	-	-
2020	2	14,800	2	4,182	2	3,690	-	-	6	22,672
2021	-	-	-	-	-	-	1	11,923	1	11,923
YTD 2022	1	6,523	-	-	-	-	-	-	1	6,523
<b>Total</b>	<b>3</b>	<b>21,323</b>	<b>2</b>	<b>4,182</b>	<b>2</b>	<b>3,690</b>	<b>1</b>	<b>11,923</b>	<b>8</b>	<b>41,118</b>
<i>Source: Bank Data</i>										

Notable examples of GB's CD loans in the Colorado Non-MSA AA include:

- In 2021, GB originated a \$11.9 million revitalization loan to construct a modular home plant in an underserved community in a designated underserved geography in the AA, which will create 60 new permanent jobs for LMI workers.
- In 2020, GB originated a \$9.5 million LIHTC loan that provided 34 units of affordable housing to LMI individuals and families in the AA.
- In 2020, GB originated a \$5.3 million loan for a multifamily complex providing 40 units of affordable housing to LMI individuals and families in the AA.

## **INVESTMENT TEST**

GB has a significant level of qualified CD investments and grants in the Colorado Non-MSA AA, exhibits excellent responsiveness to credit and CD needs, and occasionally uses innovative and complex investments to support CD initiatives.

### **Investment and Grant Activity**

The institution has a significant level of qualified CD investments, grants, and donations, particularly those not routinely provided by private investors, often in a leadership position. During the evaluation period, GB made \$2.5 million in new investments, continued to hold \$76 thousand in prior period investments, and provided \$120 thousand in donations that directly benefited the AA.

This level represents an increase from the prior evaluation when GB's qualified investments and donations totaled \$581 thousand. A single loan for \$2.5 million bolstered GB's investment efforts towards affordable housing, a primary CD need identified in the AA. The following table details the bank's investments and donations by year and CD purpose.

Qualified Investments – CO Non-MSA										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	2	76	-	-	-	-	-	-	2	76
2019	-	-	-	-	-	-	-	-	-	-
2020	-	-	-	-	-	-	-	-	-	-
2021	1	2,500	-	-	-	-	-	-	1	2,500
YTD 2022	-	-	-	-	-	-	-	-	-	-
<b>Subtotal</b>	<b>3</b>	<b>2,576</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>3</b>	<b>2,576</b>
Qualified Grants & Donations	4	10	29	62	4	18	11	30	48	120
<b>Total</b>	<b>7</b>	<b>2,586</b>	<b>29</b>	<b>62</b>	<b>4</b>	<b>18</b>	<b>11</b>	<b>30</b>	<b>51</b>	<b>2,696</b>
<i>Source: Bank Data</i>										

The following are notable examples of investments and donations made in the Colorado Non-MSA AA.

- In 2021, GB invested in a \$2.5 million LIHTC investment that provided 48 units of affordable housing to LMI individuals and families in the AA.
- In 2022, GB donated \$15 thousand to a local economic development corporation that supports small business job creation and retention in the AA.
- From 2019 to 2022, GB provided sponsorships for students from primarily underserved schools within the AA for the Everfi financial education course totaling \$10 thousand.

### **Responsiveness to Credit and Community Development Needs**

GB exhibits excellent responsiveness to credit and CD needs. The bank demonstrated responsiveness to the Colorado Non-MSA AA through its focus on funding investments targeting the identified community need of affordable housing. Overall, GB funded \$2.6 million in qualified investments targeted to affordable housing needs.

### **Community Development Initiatives**

GB occasionally uses innovative and complex investments in the Colorado Non-MSA AA to support CD initiatives. In this AA, the bank funded 1 LIHTC investment totaling \$2.5 million. Refer to the bank-wide Community Development Initiatives for further details on the bank's initiatives.

### **SERVICE TEST**

Delivery systems are readily accessible to all portions of the AA. Services, including business hours, do not vary in a way that inconveniences certain portions of the AA, particularly LMI geographies and/or individuals. GB provides a relatively high level of CD services in the AA. GB

did not open or close any branches in the AA during the evaluation period; as such, this criterion did not affect AA conclusions.

### **Accessibility of Delivery Systems**

Delivery systems are readily accessible to essentially all portions of the institution's AA. There are no low-income CTs in the AA. The bank has 13 branches in the AA. Of these, three are located in moderate-income geographies, which compares favorably to peer institutions, the population of families, percentage of the AA households, and businesses located in these geographies. Six branches are located in middle-income geographies and the remaining four branches are located in an upper-income geography.

### **Changes in Branch Locations**

GB did not open or close any branches in the AA during the evaluation period; as such, this criterion did not affect AA conclusions.

### **Reasonableness of Business Hours and Services**

Services, including business hours, do not vary in a way that inconveniences certain portions of the AA, particularly LMI geographies and/or individuals. Services and business hours are virtually the same in the non-MSA AA as those discussed in the Service Test portion for the State of Colorado. Five of the bank's branches offer Saturday hours, and all but two of the branches in the AA have drive-up service.

### **Community Development Services**

The bank provides a relatively high level of CD services in the CO Non-MSA AA. During the evaluation period, bank staff provided 925 hours of qualified CD services. Service hours increased since the prior evaluation, when GB employees provided 321 hours to the AA.

The majority of services provided by the bank targeted community services; however, bank staff also provided 109 hours towards affordable housing initiatives, reflecting responsiveness to the credit needs in the community. The following table details the institution's CD services by year and type of service provided.

Community Development Services – CO Non-MSA					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	# Hours	# Hours	# Hours	# Hours	# Hours
2019	33	126	7	4	<b>170</b>
2020	34	236	55	5	<b>330</b>
2021	26	166	41	14	<b>247</b>
YTD 2022	16	69	41	52	<b>178</b>
<b>Total</b>	<b>109</b>	<b>597</b>	<b>144</b>	<b>75</b>	<b>925</b>
<i>Source: Bank Data</i>					

Notable examples of CD services in the CO Non-MSA AA include:

- From 2019 to 2022, an Officer of the bank contributed 34 hours serving on the Board for a local affordable housing organization in the AA.
- From 2021 to 2022, a GB loan officer contributed 31 hours serving on the Board of a local non-profit that provides community services for abused LMI children in the AA.
- From 2021 to 2022, an Officer of the bank contributed 44 hours serving on the Board of a local non-profit that provides essential community services to LMI youth in the AA.

## OTHER ASSESSMENT AREAS – Limited-Scope Review

### CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED-SCOPE ASSESSMENT AREAS

The following table summarizes performance in each limited-scope AA as compared to performance in the State of Colorado AA in which full-scope procedures were conducted. The conclusions are based on a review of available facts and data, aggregate lending comparisons and demographic information. The conclusions from the areas reviewed using limited-scope procedures did not impact or alter the institution's overall performance rating.

Assessment Area	Lending Test	Investment Test	Service Test
Denver-Aurora	Below	Consistent	Consistent
Pueblo-Canon City	Consistent	Consistent	Consistent
Grand Junction	Below	Below	Consistent
Colorado Springs	Consistent	Consistent	Below

The following facts and data support the conclusions for the AA. Also included are details regarding the number and dollar volume of small business, home mortgage, small farm, and community development loans originated during the review period; qualified investments (new and prior period) and donations during the review period; and community development services for the review period. Unless otherwise noted, Branch distribution and service hours are consistent with Colorado overall, and products, services, and alternative delivery systems are discussed at the institution level. Additional information is in the Limited-Scope Assessment Areas Appendices.

#### Denver Aurora

GB operates three full-service branches in the AA: one in middle-, and two in upper-income geographies. The bank opened one new branch in an upper-income geography during the review period. The following table details the bank's activities in this AA.

Activity	#	\$
Small Business Loans	1,069	217,382
Home Mortgage Loans	290	161,355
Small Farm Loans	6	690
Community Development Loans	13	48,774
Investments (New)	11	105,015
Investments (Prior Period)	9	55,931
Donations	52	162
CD Services	468	-
<i>Source: Bank Data</i>		

#### Pueblo-Canon City

GB operates four full-service branches in the AA: one in moderate-, one in middle-, and two in upper-income geographies. The bank did not open or close any branches in the AA during the review period. The following table details the bank's activities in the AA.



<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	788	97,512
Home Mortgage Loans	197	34,854
Small Farm Loans	22	4,752
Community Development Loans	8	12,952
Investments (New)	2	1,455
Investments (Prior Period)	2	6,272
Donations	28	69
CD Services	542	-
<i>Source: Bank Data</i>		

### **Grand Junction**

GB operates four full-service branches in the AA: one in moderate-, two in middle-, and one in an upper-income geography. The bank did not open or close any branches in the AA during the review period. The following table details the bank's activities in this AA.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	553	86,797
Home Mortgage Loans	152	30,320
Small Farm Loans	13	2,205
Community Development Loans	3	4,260
Investments (New)	-	-
Investments (Prior Period)	2	99
Donations	30	75
CD Services	401	-
<i>Source: Bank Data</i>		

### **Colorado Springs**

GB operates one full-service branch in a moderate-income geography in the AA. The bank did not open or close any branches in the Colorado Springs AA during the review period. The following table details the bank's activities in this AA.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	314	53,944
Home Mortgage Loans	138	42,609
Small Farm Loans	1	20
Community Development Loans	2	2,376
Investments (New)	3	7,397
Investments (Prior Period)	2	2,320
Donations	4	7
CD Services	26	-
<i>Source: Bank Data</i>		

## ARIZONA

### CRA RATING FOR ARIZONA: SATISFACTORY

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN ARIZONA

GB operates within six AAs in the State of Arizona; see the following table. In 2019, the bank delineated Coconino County, which represents the Flagstaff AA. In 2020, GB incorporated Mohave County, which represents the Lake Havasu City-Kingman AA, and also added Maricopa County to the Phoenix-Mesa-Scottsdale AA. Refer to individual AAs for key demographic, economic information, and a summary of applicable changes specific to each.

Description of Assessment Areas		
Assessment Area	Counties in Assessment Area	# of CTs
Prescott	Yavapai	42
Flagstaff	Coconino	28
Lake Havasu City-Kingman	Mohave	43
Phoenix-Mesa-Scottsdale	Pinal, Maricopa	991
Tucson	Pima	241
Yuma	Yuma	55
Source: Bank Data		

### SCOPE OF EVALUATION – ARIZONA

Consistent with the overall Scope of Evaluation, home mortgage, small business, and small farm loan products were analyzed for the Arizona AAs, with the greatest consideration given to home mortgage and small business loans.

Based on the lending activity, deposit volume, and branch distribution in the following table, the Prescott AA was evaluated using full-scope examination procedures and carries greater weight in determining ratings for the State of Arizona. The remaining AAs were evaluated using limited-scope examination procedures.

Assessment Area Breakdown of Loans, Deposits, and Branches						
Assessment Area	Loans		Deposits		Branches	
	\$(000s)	% Bank Total	\$(000s)	% Bank Total	#	% Bank Total
Prescott	279,557	2.3	449,380	2.7	4	2.2
Lake Havasu City-Kingman	196,456	1.6	497,589	2.9	5	2.6
Phoenix-Mesa-Scottsdale	180,396	1.5	55,564	0.3	2	1.0
Yuma	142,292	1.1	388,841	2.3	2	1.0
Flagstaff	70,012	0.6	35,125	0.2	1	0.5
Tucson	27,269	0.2	27,555	0.2	1	0.5
<b>Arizona</b>	<b>895,982</b>	<b>7.3</b>	<b>1,454,054</b>	<b>8.6</b>	<b>15</b>	<b>7.8</b>
<i>Source: Bank Records, FDIC Summary of Deposits (6/30/2021)</i>						

## CONCLUSIONS ON PERFORMANCE CRITERIA IN ARIZONA

### LENDING TEST

GB is rated “High Satisfactory” in the Lending Test in the State of Arizona. The bank’s performance in the Arizona AAs was consistent with this conclusion, with the exception of the Lake Havasu City-Kingman AA, where performance was below that of the overall conclusion.

#### Lending Activity

GB’s lending levels reflect adequate responsiveness to AA credit needs. Refer to each Arizona AA analysis for details.

#### Geographic Distribution

The geographic distribution of loans reflects good penetration throughout the Arizona AAs. The bank’s performance in each of the Arizona AAs was consistent with this conclusion, with the exception of the Lake Havasu City-Kingman and Tucson AAs, where performance was below that of the overall conclusion.

#### Borrower Profile

The distribution of borrowers in Arizona reflects good penetrations. GB’s performance in each of the Arizona AAs was consistent with this conclusion, with the exception of the Lake Havasu City-Kingman AA, where performance was below that of the overall conclusion.

#### Community Development Loans

GB is a leader in making CD loans in the Arizona AAs. The bank originated 117 CD loans totaling \$267.7 million in the State of Arizona, which includes 2 regional CD loans totaling \$10.7 million during the evaluation period. This performance represents a significant increase since the last

examination, when GB made 2 CD loans totaling \$3.6 million. In addition, GB primarily targeted affordable housing opportunities through the review period with 26 loans totaling \$89.6 million.

Performance was consistent throughout the Arizona AAs. The Prescott AA weighed most heavily in forming conclusions. The following table presents the bank’s CD loans in the State of Arizona by year and CD purpose. Refer to each individual AA for specific details and notable examples.

<b>Community Development Lending – State of Arizona</b>										
<b>Activity Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
2019	3	3,712	-	-	4	15,221	1	2,832	<b>8</b>	<b>21,765</b>
2020	9	16,794	34	10,351	3	3,394	4	8,634	<b>50</b>	<b>39,172</b>
2021	7	41,810	18	3,370	11	30,375	5	31,067	<b>41</b>	<b>106,623</b>
YTD 2022	7	27,295	1	3,250	4	24,861	6	44,696	<b>18</b>	<b>100,102</b>
<b>Total</b>	<b>26</b>	<b>89,611</b>	<b>53</b>	<b>16,971</b>	<b>22</b>	<b>73,851</b>	<b>16</b>	<b>87,229</b>	<b>117</b>	<b>267,662</b>
<i>Source: Bank Data</i>										

Notable examples of GB’s CD loans in Arizona that aren’t attributable to a specific AA include:

- In 2021, GB originated a \$7.5 million affordable housing loan that provided 60 affordable housing units to LMI renters in an area outside the bank’s AAs.
- In 2021, GB originated a \$3.2 million SBA 504 loan that promoted economic development through the creation of 5 new jobs for a small business located outside the bank’s AAs.

## **INVESTMENT TEST**

GB is rated “High Satisfactory” in the Investment Test in the State of Arizona. The bank’s performance in the Arizona AAs varied somewhat. The Prescott, Phoenix, and Tucson AAs support this conclusion while the Lake Havasu, Yuma, and Flagstaff AAs performed below that of the overall performance conclusion.

### **Investment and Grant Activity**

The bank has a relatively high level of qualified CD investments and grants throughout the Arizona AAs, particularly those not routinely provided by private investors, occasionally in a leadership position. GB reported a total of \$47.3 million in total qualified investments and grants. This total includes nearly \$1.1 million in grants or donations and approximately \$9.1 million in prior period investments. This represents a significant increase from the prior evaluation, when GB’s qualified investments and donations totaled approximately \$10.4 million. The majority of GB’s qualified investments and grants or donations targeted affordable housing, an identified CD need for the AAs. The following table details the bank’s qualified investments, grants, and donations by year and CD purpose.

Qualified Investments – State of Arizona										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	5	6,108	-	-	3	600	2	2,345	10	9,053
2019	-	-	-	-	1	100	-	-	1	100
2020	6	20,513	6	2,284	1	250	1	17	14	23,064
2021	2	1,926	-	-	-	-	-	-	2	1,926
YTD 2022	3	12,044	-	-	-	-	-	-	3	12,044
<b>Subtotal</b>	<b>16</b>	<b>40,591</b>	<b>6</b>	<b>2,284</b>	<b>5</b>	<b>950</b>	<b>3</b>	<b>2,361</b>	<b>30</b>	<b>46,186</b>
Qualified Grants & Donations	13	27	282	1,067	1	1	-	-	296	1,095
<b>Total</b>	<b>29</b>	<b>40,618</b>	<b>288</b>	<b>3,351</b>	<b>6</b>	<b>951</b>	<b>3</b>	<b>2,361</b>	<b>326</b>	<b>47,281</b>
<i>Source: Bank Data</i>										

GB reported four regional investments or donations totaling \$2.5 million that aren't attributable to a specific AA. Notable examples of these regional investments include:

- GB maintains \$1.8 million from a prior period investment that revitalized an area by providing community services to LMI individuals and families on a reservation located outside the bank's AAs.
- GB maintains \$500 thousand from a prior period investment in a local CDFI that supports the revitalization and stabilization of distressed communities outside the bank's AAs.

### **Responsiveness to Credit and Community Development Needs**

GB exhibits excellent responsiveness to credit and CD needs. The bank demonstrated responsiveness to its Arizona AAs through its focus on funding investments targeting the identified community need of affordable housing. Overall, GB funded \$40.6 million in qualified investments targeted to affordable housing needs.

### **Community Development Initiatives**

GB makes significant use of innovative and complex investments in the Arizona AAs to support CD initiatives. In the Arizona AAs, the bank funded 4 LIHTC investments totaling \$14.4 million and 5 EQ2 investments totaling \$1.0 million. Refer to the bank-wide Community Development Initiatives for further details on the bank's initiatives.

### **SERVICE TEST**

GB is rated "High Satisfactory" in the Service Test in the State of Arizona. The bank's performance in the Phoenix AA was consistent with this conclusion. Performance in the Prescott, Yuma, and Flagstaff AAs was below that of the overall performance, while performance in the Lake Havasu City-Kingman and Tucson AAs was above that of the overall conclusion.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the institution's Arizona AAs. GB operates 15 full-service branches throughout the 6 Arizona AAs: one branch is located in a low-income CT (6.7 percent), four branches are located in moderate-income CTs (26.7 percent), six branches are located in middle-income geographies (40.0 percent), and four branches are located in upper-income CTs (26.7 percent). Refer to each full- and limited-scope analysis for specific details regarding the bank's accessibility of delivery systems.

### **Changes in Branch Locations**

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the evaluation period, the bank opened 9 new branches, through an acquisition of State Bank of Arizona. Of these, 3 were opened in the Prescott AA, 5 were opened in the Lake Havasu-Kingman AA, and 1 was opened in the Phoenix AA. One branch in the Tucson AA located in an upper-income geography was relocated within the same geography. The bank also closed two branches Arizona during the review period in the Prescott MSA, and relocated a branch within the same geography. Refer to each full- and limited-scope analysis for complete details regarding the changes in branch locations.

### **Reasonableness of Business Hours and Services**

Services, including business hours, do not vary in a way that inconveniences certain portions of the AAs, particularly LMI geographies and/or individuals. All of the bank's products are available at all of the branches in the AA. Branch locations have virtually the same hours that vary slightly according to AA needs. Of the 15 branches, 10 have drive-up facilities. The bank does not offer weekend hours in its Arizona branches. Refer to each AA for additional details.

### **Community Development Services**

GB provides a relatively high level of CD services in its Arizona AAs. Bank staff provided 2,895 CD services hours to organizations throughout the review period. The volume of CD service hours in the Arizona AAs increased more than 10 fold since the previous evaluation where the bank totaled 242 service hours.

While employees performed services targeting all four CD areas, the majority of service activity targeted community services for LMI populations. The substantial majority of service hours were provided in the Lake Havasu, Phoenix, and Tucson AAs. The following table details the bank's CD services in the Arizona AAs by year and CD purpose. Refer to each full- and limited-scope analysis for further detail.

Community Development Services – State of Arizona					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	# Hours	# Hours	# Hours	# Hours	# Hours
2019	26	448	256	-	730
2020	226	294	184	-	704
2021	135	447	365	40	987
YTD 2022	65	347	36	26	474
<b>Total</b>	<b>452</b>	<b>1,536</b>	<b>841</b>	<b>66</b>	<b>2,895</b>
<i>Source: Bank Data</i>					

In 2021, a bank Officer provided seven CD service hours assisting with a grant application for a Housing Authority serving the local Native American Reservation located outside the bank's AAs.

## **PRESCOTT – Full-Scope Review**

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN PRESCOTT**

The Prescott AA consists of all 42 CTs in Yavapai County, which represents the Prescott MSA #39150 in its entirety. GB has not made any changes to the AA since the previous evaluation.

#### **Economic and Demographic Data**

The AA consists of 11 moderate-, 22 middle-, and 9 upper-income CTs. The AA does not contain any low-income CTs. See the following table for additional demographic information.

Demographic Information of the Assessment Area
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Assessment Area: GB AZ Prescott Valley Prescott MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	42	0.0	26.2	52.4	21.4	0.0
Population by Geography	215,996	0.0	24.4	57.2	18.4	0.0
Housing Units by Geography	111,731	0.0	21.9	57.6	20.6	0.0
Owner-Occupied Units by Geography	64,499	0.0	18.7	61.2	20.1	0.0
Occupied Rental Units by Geography	27,811	0.0	31.3	49.2	19.4	0.0
Vacant Units by Geography	19,421	0.0	18.7	57.6	23.7	0.0
Businesses by Geography	33,834	0.0	21.2	51.5	27.3	0.0
Farms by Geography	963	0.0	20.7	55.1	24.2	0.0
Family Distribution by Income Level	58,562	18.8	19.3	22.4	39.6	0.0
Household Distribution by Income Level	92,310	22.8	17.1	18.9	41.3	0.0
Median Family Income MSA - 39150 Prescott Valley-Prescott, AZ MSA		\$54,475	Median Housing Value			\$204,530
			Median Gross Rent			\$878
			Families Below Poverty Level			11.1%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

Housing values are significantly above the median family income in the AA and the percentage of families below the poverty level is substantial, creating limited opportunities for individuals to obtain home mortgage loans. The local economy is fueled by education and health services, government, and the retail trade industry. Yavapai Regional Medical Center, Yavapai County Government, Veterans Administration Medical Center, and Prescott Unified School District are among the area's largest employers. The following table illustrates unemployment rates by year for the AA compared to Arizona and the nation.

Unemployment Rates – Prescott MSA			
Area	2019	2020	2021
	%	%	%
Yavapai County	4.6	7.3	4.1
Arizona	4.9	7.7	4.9
National Average	3.7	8.1	5.3
Source: Bureau of Labor Statistics			

## **Competition**

According to the June 30, 2021 Deposit Market Share Report, GB ranked 4<sup>th</sup> out of 13 FDIC-insured institutions competing within the AA, with a total of 8.3 percent of the deposit market share. According to the same data, the bank has 4 out of 44 branches in the AA.



## **Community Contact**

Examiners reviewed an existing community contact with an organization that helps launch, grow, and sustain small businesses in the AA. The organization provides counseling, training, and technical assistance to business owners and entrepreneurs. According to the contact, the pandemic forced the organization to shift to securing emergency funding for small business clients via Economic Injury Disaster and Payment Protection Program Loans offered through the SBA. The contact noted that the economy in the area is recovering, and the organization is seeing an emphasis on conventional lending needs for business expansion for smaller businesses. The contact also stated that businesses are looking for additional flexibility from institutions when evaluating credit worthiness. The contact stated that financial education offerings are very limited in the AA.

## **Credit and Community Development Needs and Opportunities**

Examiners determined that affordable housing and small business lending represent primary credit needs in the AA. Information obtained from a community contact and demographic data supports this conclusion. There are opportunities for financial institutions to focus on providing support for affordable housing initiatives and programs. In addition, banking partners have opportunities to provide loan products with more flexibility for borrowers that may not qualify for loans based on traditional credit underwriting criteria. Additional resources for financial education are also needed.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN PRESCOTT LENDING TEST**

GB's lending levels reflect adequate responsiveness to AA credit needs. The geographic distribution of loans reflects good penetration. The distribution of borrowers reflects good penetration among individuals and businesses. GB is a leader in making CD loans in the AA.

### **Lending Activity**

GB's lending levels reflect adequate responsiveness to AA credit needs. During the review period, GB originated 880 small business loans totaling \$120.5 million, 526 home mortgage loans totaling \$157.4 million, and 15 small farm loans totaling \$1.6 million.

In the prior evaluation, the bank originated 1 small business loan totaling \$100 thousand, 8 home mortgage loans totaling \$1.9 million, and no small farm loans. In addition, the bank operated only two branches in the AA at the prior evaluation, both of which had been opened during the review period.

Aggregate lending data from 2020 shows a total of 6,251 small business loans were originated by 110 lenders in the AA. GB ranked 6<sup>th</sup> among this group, with 8.2 percent of the total market share. GB also ranked 23<sup>rd</sup> among 521 lenders originating home mortgage loans. Peer mortgage data from 2020, shows the bank with a total of 1.1 percent of the 29,542 mortgage loans originated. In addition, aggregate lending data from 2020 shows 10 lenders originated a total of 64 small farm loans. GB ranked 4<sup>th</sup> among this group, with a total of 9.3 percent market share.

## **Geographic Distribution**

The geographic distribution of loans reflects good penetration throughout the AA. GB's excellent small business and adequate home mortgage lending performance support this conclusion. Lending analysis was limited to GB's performance in moderate-income CTs, since there are no low-income geographies in the AA.

### *Small Business*

The geographic distribution of small business loans reflects excellent penetration throughout the AA. The bank's small business lending to moderate-income geographies was well above D&B data and the rates reported by aggregate lenders throughout the evaluation period and trended upward in 2021.

### *Home Mortgage*

The geographic distribution of home mortgage loans reflects adequate penetration throughout the AA. GB's home mortgage lending in moderate-income areas was above demographic data and aggregate performance in 2019, and comparable in 2020 and 2021.

## **Borrower Profile**

The distribution of borrowers reflects good penetration among retail customers of different income levels and businesses of different sizes. Good small business and adequate home mortgage lending performance supports this conclusion.

### *Small Business*

The distribution of borrowers reflects good penetration to businesses with GARs of \$1 million or less. GB's lending to small businesses was in line with the rates reported by aggregate lenders in 2019 and significantly above other lenders in 2020. The institution's performance remained consistent in 2021.

### *Home Mortgage*

The distribution of borrowers reflects adequate penetration to LMI borrowers. GB's lending to low- and moderate-income borrowers in 2019 was below the rates reported by aggregate lenders. The institution's performance improved in 2020, and was in line with the rates achieved by other lenders. In 2021, GB's performance registered a decline.

## **Community Development Loans**

GB is a leader in making CD loans in the Prescott AA where the bank originated 35 CD loans totaling \$35.2 million. This performance represents a significant increase since the last examination, when GB made two CD loans totaling \$3.6 million in the Prescott AA. GB contributed loans to each CD purpose throughout the review period, with the majority of its efforts targeting economic development.

GB's CD loan performance in the Prescott AA is consistent with the bank's performance in the State of Arizona. The following table presents the bank's CD loans in the Prescott AA by year and CD purpose.

<b>Community Development Lending – Prescott MSA</b>										
<b>Activity Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
2019	-	-	-	-	3	12,519	-	-	3	12,519
2020	-	-	16	2,303	-	-	1	1,180	17	3,483
2021	-	-	10	1,350	3	6,609	-	-	13	7,959
YTD 2022	1	5,750	-	-	1	5,449	-	-	2	11,199
<b>Total</b>	<b>1</b>	<b>5,750</b>	<b>26</b>	<b>3,653</b>	<b>7</b>	<b>24,577</b>	<b>1</b>	<b>1,180</b>	<b>35</b>	<b>35,160</b>
<i>Source: Bank Data</i>										

Notable examples of GB's CD loans in the Prescott AA include:

- In 2019, GB originated a \$6.3 million SBA 504 loan to a small business promoting economic development with the creation of 14 new jobs for LMI workers in the AA.
- In 2022, GB originated a \$5.8 million loan to construct a 180 unit mobile home park that will offer affordable housing in a moderate-income geography in the AA.
- In 2022, GB renewed a \$5.4 million SBA 504 loan to a manufacturing company promoting economic development by retaining 69 jobs and creating 80 additional jobs for LMI workers in the AA.

## **INVESTMENT TEST**

GB has a relatively high level of qualified CD investments and grants in the Prescott AA, exhibits adequate responsiveness to credit and CD needs, and occasionally uses innovative and complex investments to support CD initiatives.

### **Investment and Grant Activity**

The institution has a relatively high level of qualified CD investments, grants, and donations, particularly those not routinely provided by private investors, occasionally in a leadership position. During the evaluation period, GB made \$505 thousand in new investments, continued to hold \$166 thousand in prior period investments, and provided \$215 thousand in donations that directly benefited the AA.

This level represents an increase of almost doubled activity since the prior evaluation when GB's qualified investments and donations totaled \$481 thousand. The majority of GB's investments focused on the provision of community services in the AA. The following table details the bank's investments and donations by year and CD purpose.

Qualified Investments – Prescott MSA										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	1	166	-	-	-	-	-	-	1	166
2019	-	-	-	-	-	-	-	-	-	-
2020	-	-	1	505	-	-	-	-	1	505
2021	-	-	-	-	-	-	-	-	-	-
YTD 2022	-	-	-	-	-	-	-	-	-	-
<b>Subtotal</b>	<b>1</b>	<b>166</b>	<b>1</b>	<b>505</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>2</b>	<b>671</b>
Qualified Grants & Donations	5	15	83	199	1	1	-	-	89	215
<b>Total</b>	<b>6</b>	<b>181</b>	<b>84</b>	<b>704</b>	<b>1</b>	<b>1</b>	<b>-</b>	<b>-</b>	<b>91</b>	<b>886</b>
<i>Source: Bank Data</i>										

The following are notable examples of investments and donations made in the Prescott AA.

- In 2020, GB invested in a \$500 thousand in a community services bond to support essential infrastructure for a school in the AA comprised primarily of LMI students.
- From 2021 to 2022, GB donated \$20 thousand to LMI students as a needs based scholarship to a rapid workforce program through a local college in the AA.

### **Responsiveness to Credit and Community Development Needs**

GB exhibits adequate responsiveness to credit and CD needs. The bank maintained one prior period investment and donated five times throughout the review period towards affordable housing initiatives. Overall, GB funded \$181 thousand in qualified investments or donations targeted to affordable housing needs.

### **Community Development Initiatives**

GB occasionally uses innovative or complex investments in the Prescott AA to support CD initiatives. In this AA, the bank funded one new qualified investment, a community services bond structured to support essential infrastructure for a local school.

### **SERVICE TEST**

Delivery systems are readily accessible to all portions of the Prescott AA. Services, including business hours, do not vary in a way that inconveniences certain portions of the AA, particularly LMI geographies and/or individuals. GB provides an adequate level of CD services in the AA. The institution's opening and closing of branches improved the accessibility of delivery systems.

### **Accessibility of Delivery Systems**

Delivery systems are readily accessible to all portions of the institution's AA. There are no low-

income tracts in the AA. The bank operates four full-service branches in the Prescott AA. Two are located in moderate-income geographies, which exceeds the peer branch distribution in the same geographies. The bank's presence in moderate-income CTs also significantly exceeds the percentage of AA families, households and businesses located in moderate-income geographies. The bank's remaining two branches are operated in middle-income geographies.

### **Changes in Branch Locations**

To the extent changes have been made, the institution's opening and closing of branches improved the accessibility of delivery systems, particularly in LMI geographies and/or to LMI individuals. During the evaluation period, the bank opened 3 branches as part of its acquisition of State Bank of Arizona. Branch openings included 2 in moderate-income geographies in Prescott and Prescott Valley, as well as 1 in an upper-income geography in Cottonwood. The bank also closed 2 branches in the Prescott AA, including one in a moderate-income geography and one in an upper-income geography. The bank also relocated a branch within the same geography.

### **Reasonableness of Business Hours and Services**

Services, including business hours, do not vary in a way that inconveniences certain portions of the AA, particularly LMI geographies and/or individuals. Services and business hours are virtually the same in the Prescott AA as those discussed in the Service Test portion for the State of Arizona. Of the four branches, three have drive-up facilities, and none are open on weekends.

### **Community Development Services**

The bank provides an adequate level of CD services in the Prescott AA. During the evaluation period, bank staff provided 356 hours of qualified CD services. Service hours increased slightly from the prior evaluation, when GB employees provided 120 hours to the AA. The majority of services provided by the bank targeted community services. The following table details the institution's CD services by year and CD purpose.

<b>Community Development Services – Prescott MSA</b>					
<b>Activity Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b># Hours</b>	<b># Hours</b>	<b># Hours</b>	<b># Hours</b>	<b># Hours</b>
2019	-	37	-	-	<b>37</b>
2020	6	51	51	-	<b>108</b>
2021	-	59	54	40	<b>153</b>
YTD 2022	-	58	-	-	<b>58</b>
<b>Total</b>	<b>6</b>	<b>205</b>	<b>105</b>	<b>40</b>	<b>356</b>
<i>Source: Bank Data</i>					

Notable examples of CD services in the Prescott AA include:

- From 2019 to 2021, a GB loan officer contributed 51 hours serving on the Board for a local financial education support and community service for a school in the AA comprised primarily of LMI students.
- In 2022, a GB manager contributed 5 hours providing financial education to LMI individuals at a women's shelter in the AA.
- In 2022, a GB loan officer contributed 19 hours serving on the Board of a local non-profit that primarily provides essential community services to LMI youth in the AA.

## OTHER ASSESSMENT AREAS – Limited-Scope Review

### CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED-SCOPE ASSESSMENT AREAS

The following table summarizes performance in each limited-scope AA as compared to performance in the State of Arizona AA in which full-scope procedures were conducted. The conclusions are based on a review of available facts and data, aggregate lending comparisons and demographic information. The conclusions from the areas reviewed using limited-scope procedures did not impact or alter the institution's overall performance rating.

Assessment Area	Lending Test	Investment Test	Service Test
Lake Havasu City-Kingman	Below	Below	Exceeds
Phoenix-Mesa-Scottsdale	Consistent	Exceeds	Consistent
Yuma	Consistent	Below	Below
Flagstaff MSA	Consistent	Below	Below
Tucson	Consistent	Exceeds	Exceeds

The following facts and data support the conclusions for the AA. Also included are details regarding the number and dollar volume of small business, home mortgage, small farm, and community development loans originated during the review period; qualified investments (new and prior period) and donations during the review period; and community development services for the review period. Unless otherwise noted, Branch distribution and service hours are consistent with Arizona overall, and products, services, and alternative delivery systems are discussed at the institution level. Additional information is in the Limited-Scope Assessment Areas Appendices.

#### Lake Havasu City - Kingman

GB has five branches in the AA, all of which were acquired during the evaluation period. Of the five, two are located in middle-income geographies and three are located in upper-income geographies. The following table details the bank's activities in this AA.

Activity	#	\$
Small Business Loans	440	47,894
Home Mortgage Loans	516	148,562
Small Farm Loans	0	0
Community Development Loans	10	6,344
Investments (New)	-	-
Investments (Prior Period)	-	-
Donations	36	76
CD Services	702	-
<i>Source: Bank Data</i>		

#### Phoenix – Mesa - Scottsdale

The bank operates two branches in the Phoenix-Mesa-Scottsdale MSA, one located in a low-income geography, and one located in a middle-income geography. The bank opened a branch in a middle-income geography during the evaluation period. The following table details the bank's activities in this AA.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	274	48,473
Home Mortgage Loans	191	123,132
Small Farm Loans	53	8,791
Community Development Loans	25	94,997
Investments (New)	12	24,737
Investments (Prior Period)	1	166
Donations	86	548
CD Services	739	-
<i>Source: Bank Data</i>		

### **Yuma**

GB operates two branches in the Yuma AA, one of which is located in a moderate-income geography, and one is located in a middle-income geography. The bank did not open or close any branches in the AA during the review period. The following table details the bank's activities in this AA.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	596	97,846
Home Mortgage Loans	100	34,273
Small Farm Loans	53	10,173
Community Development Loans	10	10,944
Investments (New)	-	-
Investments (Prior Period)	1	166
Donations	37	122
CD Services	82	-
<i>Source: Bank Data</i>		

### **Flagstaff**

GB has one branch in the Flagstaff AA, located in a moderate-income geography. No branches were opened or closed since the previous evaluation. The following table details the bank's activities in this AA.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	383	42,971
Home Mortgage Loans	60	26,643
Small Farm Loans	5	398
Community Development Loans	13	21,914
Investments (New)	-	-
Investments (Prior Period)	-	-
Donations	26	76
CD Services	103	-
<i>Source: Bank Data</i>		

### **Tucson**

GB has one branch in the AA, which relocated during the review period and continues to be located in an upper-income tract. GB did not open or close any branches during the review period. The following table details the bank's activities in this AA.



<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	103	15,745
Home Mortgage Loans	26	11,524
Small Farm Loans	0	0
Community Development Loans	22	87,600
Investments (New)	6	11,776
Investments (Prior Period)	5	6,211
Donations	21	54
CD Services	908	-
<i>Source: Bank Data</i>		

## WASHINGTON

### CRA RATING FOR WASHINGTON: SATISFACTORY

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: Low Satisfactory

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN WASHINGTON

GB operates within three AAs in the State of Washington; see the following table. The institution has not made any changes to the AA since the prior evaluation. Refer to individual AAs for key demographic and economic information specific to each.

Description of Assessment Areas		
Assessment Area	Counties in Assessment Area	# of CTs
Spokane	Spokane	105
Wenatchee	Chelan, Douglas	22
Washington Non-MSA	Grant, Okanogan, Pend Oreille	31
Source: Bank Data		

### SCOPE OF EVALUATION – WASHINGTON

Consistent with the overall Scope of Evaluation, home mortgage, small business, and small farm loan products were analyzed for the Washington AAs, with the greatest consideration given to home mortgage and small business loans.

Based on the lending activity, deposit volume, and branch distribution in the following table, the Spokane AA was evaluated using full-scope examination procedures and carries greater weight in determining ratings for the State of Washington. The remaining AAs were evaluated using limited-scope examination procedures.

Assessment Area Breakdown of Loans, Deposits, and Branches						
Assessment Area	Loans		Deposits		Branches	
	\$(000s)	% Bank Total	\$(000s)	% Bank Total	#	% Bank Total
Spokane	509,344	4.1	140,217	0.8	4	2.1
Wenatchee	207,632	1.7	293,788	1.7	4	2.1
Washington Non-MSA	90,915	0.7	464,504	2.8	5	2.6
<b>Washington</b>	<b>807,891</b>	<b>6.5</b>	<b>898,509</b>	<b>5.3</b>	<b>13</b>	<b>6.8</b>
Source: Bank Records, FDIC Summary of Deposits (6/30/2021)						

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN WASHINGTON**

### **LENDING TEST**

GB is rated “Low Satisfactory” in the Lending Test in the State of Washington. The bank’s performance in the Spokane AA was consistent with this conclusion. Performance in the Wenatchee and Washington Non-MSA AAs was above the overall performance conclusion.

#### **Lending Activity**

GB’s lending levels reflect adequate responsiveness to AA credit needs. Refer to each Washington AA analysis for details.

#### **Geographic Distribution**

The geographic distribution of loans reflects adequate penetration throughout the Washington AAs. GB’s performance in each of the Washington AAs is consistent with this conclusion.

#### **Borrower Profile**

The distribution of borrowers in Washington reflects adequate penetration. GB’s performance in the Spokane AA was consistent with this conclusion. Performance in the Wenatchee and Non-MSA AAs was stronger.

#### **Community Development Loans**

GB is a leader in making CD loans in the Washington AAs. The bank originated 46 CD loans totaling \$99.5 million in the State of Washington, which includes 9 regional CD loans totaling \$17.4 million during the evaluation period. This performance represents a significant increase since the last examination, when GB made 20 CD loans totaling \$43.1 million. GB also contributed CD lending activities in each of the CD purposes, including affordable housing which is an identified need in the Washington AAs.

Performance was consistent throughout the Washington AAs. The Spokane AA weighed most heavily in forming conclusions. The following table presents the bank’s CD loans in the State of Washington by year and CD purpose. Refer to each individual AA for specific details and notable examples.

Community Development Lending – State of Washington										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2019	4	6,241	1	768	6	14,160	2	2,342	13	23,510
2020	3	4,418	5	13,919	2	5,581	7	8,510	17	32,429
2021	2	10,800	1	20	3	6,452	6	24,429	12	41,701
YTD 2022	1	500	-	-	-	-	3	1,331	4	1,831
<b>Total</b>	<b>10</b>	<b>21,959</b>	<b>7</b>	<b>14,707</b>	<b>11</b>	<b>26,193</b>	<b>18</b>	<b>36,612</b>	<b>46</b>	<b>99,471</b>
<i>Source: Bank Data</i>										

Notable examples of GB’s CD loans in Washington that aren’t attributable to a specific AA include:

- In 2019, GB originated a \$4.4 million SBA 504 loan for a small timber company located outside the bank’s AAs in order to finance a new facility that will create 10 new jobs for LMI workers.
- In 2020, GB originated a \$3.0 million revitalization loan to a city located in a designated distressed geography outside the bank’s AAs to fund construction of critical infrastructure.

## INVESTMENT TEST

GB is rated “High Satisfactory” in the Investment Test in the State of Washington. The bank’s performance in the Washington AAs was consistent with this conclusion, except for the WA Non-MSA AA, where performance was below that of the overall performance conclusion.

### Investment and Grant Activity

The bank has a relatively high level of qualified CD investments and grants throughout the Washington AAs, particularly those not routinely provided by private investors, occasionally in a leadership position. GB reported a total of \$37.8 million in total qualified investments and grants. This total includes \$397 thousand in grants or donations and approximately \$2.5 million in prior period investments.

This level represents an increase from the prior evaluation, when GB’s qualified investments and donations totaled approximately \$16.3 million. In addition, the great majority of GB’s qualified investments and grants or donations targeted affordable housing, an identified CD need for the AAs. The following table details the bank’s qualified investments, grants, and donations by year and CD purpose.

Qualified Investments – State of Washington										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	2	1,032	3	1,511	-	-	-	-	5	2,543
2019	2	4,990	-	-	1	1,000	-	-	3	5,990
2020	4	11,265	-	-	-	-	-	-	4	11,265
2021	13	14,881	-	-	-	-	-	-	13	14,881
YTD 2022	9	2,752	-	-	-	-	-	-	9	2,732
<b>Subtotal</b>	<b>30</b>	<b>34,920</b>	<b>3</b>	<b>1,511</b>	<b>1</b>	<b>1,000</b>	-	-	<b>34</b>	<b>37,431</b>
Qualified Grants & Donations	10	50	83	288	2	3	5	56	100	397
<b>Total</b>	<b>40</b>	<b>34,970</b>	<b>86</b>	<b>1,799</b>	<b>3</b>	<b>1,003</b>	<b>5</b>	<b>56</b>	<b>134</b>	<b>37,828</b>
<i>Source: Bank Data</i>										

From 2019 to 2021, GB reported six investments totaling \$15.9 million for bonds issued to finance the purchase of affordable housing mortgage pools in Washington, to include the bank's AAs. Additionally, in 2019, the bank made one donation for \$1 thousand to a community services organization providing services for LMI children in a geography outside the bank's AAs.

### **Responsiveness to Credit and Community Development Needs**

GB exhibits excellent responsiveness to credit and CD needs. The bank demonstrated responsiveness to its Washington AAs through its focus on funding investments targeting the identified community need of affordable housing. Overall, GB funded \$35.0 million in qualified investments targeted to affordable housing needs.

### **Community Development Initiatives**

GB occasionally uses innovative and complex investments in the Washington AAs to support CD initiatives. In the Washington AAs, the bank funded 2 LIHTC investments totaling \$3.5 million and 2 EQ2 investments totaling \$2.0 million. Refer to the bank-wide Community Development Initiatives for further details on the bank's initiatives.

### **SERVICE TEST**

GB is rated "Low Satisfactory" in the Service Test in the State of Washington. The bank's performance in the Washington AAs was consistent with this conclusion.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the institution's Washington AAs. GB operates 13 full-service branches located throughout the state, including 2 branches in moderate-income and 11 branches in middle-income CTs. Of the middle-income branches, five are located in geographies designated as distressed or underserved. Refer to each AA for specific details regarding the bank's accessibility of delivery systems.

### **Changes in Branch Locations**

GB did not open or close any branches in the Washington AAs during the evaluation period; as such, this criterion did not affect conclusions for the state.

### **Reasonableness of Business Hours and Services**

Services, including business hours, do not vary in a way that inconveniences certain portions of the Washington AAs, particularly LMI geographies and/or individuals. All of the bank's products and services are available at all of the branches in the AA and branch hours vary slightly according to AA needs. One of the 13 branch locations offers Saturday hours, as the majority of the branches are located in rural areas where customers have a high utilization of mobile and online banking. All but one of the branches provide drive-up service. Refer to each full- and limited-scope analysis for additional details.

### **Community Development Services**

GB provides an adequate level of CD services in its Washington AAs. Bank staff provided 661 CD services hours to organizations throughout the review period. The volume of CD service hours in the Washington AAs decreased 22.6 percent since the previous evaluation where the bank totaled 854 service hours.

All service activity targeted either affordable housing or community services for LMI populations. The Spokane AA weighed the heaviest in determining conclusions. The following table details the bank's CD services in the Washington AAs by year and CD purpose. Refer to each full- and limited-scope analysis for further detail.

<b>Community Development Services – State of Washington</b>					
<b>Activity Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b># Hours</b>	<b># Hours</b>	<b># Hours</b>	<b># Hours</b>	<b># Hours</b>
2019	70	61	-	-	<b>131</b>
2020	98	43	-	-	<b>141</b>
2021	112	69	-	-	<b>181</b>
YTD 2022	94	114	-	-	<b>208</b>
<b>Total</b>	<b>374</b>	<b>287</b>	<b>-</b>	<b>-</b>	<b>661</b>
<i>Source: Bank Data</i>					

## SPOKANE-SPOKANE VALLEY– Full-Scope Review

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN SPOKANE-SPOKANE VALLEY

The Spokane AA consists of all 105 CTs in Spokane County, a portion of the larger Spokane-Spokane Valley MSA #44060. GB has not made any changes to the AA since the previous evaluation.

#### **Economic and Demographic Data**

The AA consists of 1 low-, 28 moderate-, 50 middle-, and 25 upper-income CTs. One additional CT in the AA does not have an income designation. See the following table for additional demographic information.

Demographic Information of the Assessment Area						
Assessment Area: GB WA Spokane MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	105	1.0	26.7	47.6	23.8	1.0
Population by Geography	480,832	0.6	25.0	44.8	28.8	0.9
Housing Units by Geography	205,487	0.6	26.2	44.4	27.5	1.4
Owner-Occupied Units by Geography	119,096	0.1	17.8	46.9	34.9	0.4
Occupied Rental Units by Geography	70,375	1.4	38.4	41.2	16.2	2.8
Vacant Units by Geography	16,016	0.6	35.1	40.1	21.6	2.6
Businesses by Geography	47,101	3.0	33.9	35.8	26.4	0.9
Farms by Geography	1,642	1.2	15.7	45.5	37.5	0.1
Family Distribution by Income Level	119,767	20.1	16.8	22.0	41.2	0.0
Household Distribution by Income Level	189,471	24.2	16.3	16.9	42.6	0.0
Median Family Income MSA - 44060 Spokane-Spokane Valley, WA MSA		\$62,064	Median Housing Value			\$190,889
			Median Gross Rent			\$786
			Families Below Poverty Level			10.3%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

According to Moody’s Analytics, the AA economy is expanding, with payrolls jumping beyond pre-pandemic levels. The local economy is largely dependent on the defense, aerospace, and education sectors; however, employment gains are led by education and healthcare. The strong labor market has resulted in price appreciation in the housing market that outpaces that of the state and the rest of the nation. Fairchild Air Force Base, Providence Health Care – Eastern Washington,

MultiCare, Kalispell Tribal Economic Authority, and Eastern Washington University are among the area’s largest employers. Unemployment levels in the AA are generally consistent with state and national averages and are showing improvement since the peak levels observed during the height of the pandemic. The following table illustrates unemployment levels for the county compared to Washington and the nation.

<b>Unemployment Rates – Spokane-Spokane Valley MSA</b>			
<b>Area</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
	<b>%</b>	<b>%</b>	<b>%</b>
Spokane County	5.3	8.4	5.4
Washington	4.3	8.5	5.2
National Average	3.7	8.1	5.3
<i>Source: Bureau of Labor Statistics</i>			

### **Competition**

There is a high level of competition among financial institutions in the AA. According to the June 30, 2021 Deposit Market Share Report, GB ranked 12<sup>th</sup> out of 17 FDIC-insured institutions competing within the AA, with a total of 1.2 percent of the deposit market share. According to the same data, the bank has 2 out of 100 branches in the AA. The top three institutions are comprised of large regional and national associations and have a combined market share of 50.8 percent.

### **Community Contacts**

Examiners reviewed a community contact with an organization that focuses on economic development for businesses, including small and micro businesses in the AA. According to the contact, the AA was not as impacted as other counties during the pandemic. Operating grants helped retain many local businesses and the large presence of healthcare workers helped stabilize the economy. The contact stated that obtaining capital for funding small business operations and expansion continues to be a challenge, particularly those that are women, veteran, and immigrant owned. A lack of financial expertise and varying views on banking relationships present obstacles. A lack of housing stock and rapidly rising home prices are also a hindrance to supporting individuals that are relocating to join the workforce.

Examiners also reviewed a community contact with a non-profit organization that provides assistance with affordable housing targeted toward LMI individuals in the AA. The contact noted that housing stock in the AA is limited and rapidly rising home prices are creating a critical need for affordable housing. The contact works with first time home buyers going through financial education classes to build and repair credit. Upon completion of the two-year program, lower-cost housing options have been diminished, causing a disproportionate impact on LMI borrowers. The contact further stated that local banks have been helpful; however, there is a lack of down payment assistance products to help individuals in all low-income ranges.

### **Credit and Community Development Needs and Opportunities**



Considering community contact information and key economic and demographic data indicators, access to affordable housing represents a primary credit need for the AA. Opportunities exist for developing and implementing banking products with additional flexibility to help improve the accessibility of down payment assistance programs for LMI borrowers. Funding for small businesses and financial education also present community needs. In particular, products that provide additional flexibility in typical credit worthiness criteria and financial education classes for small- and first-time entrepreneurs that are trying to establish and grow their businesses.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN SPOKANE-SPOKANE VALLEY**

### **LENDING TEST**

GB's lending levels reflect adequate responsiveness to AA credit needs. The geographic distribution of loans reflects adequate penetration. The distribution of borrowers reflects adequate penetration among individuals and businesses. GB is a leader in making CD loans in the AA.

#### **Lending Activity**

GB's lending levels reflect adequate responsiveness to AA credit needs. During the review period, GB originated 658 small business loans totaling \$104.9 million, 947 home mortgage loans totaling \$404.0 million, and 3 small farm loans totaling \$343 thousand. In the prior evaluation, the bank originated 211 small business loans totaling \$39.0 million, 717 home mortgage loans totaling \$163.8 million, and no small farm loans. GB's lending activity registers an increase, and with the exception of small business lending, the bank's market share remained consistent with the prior evaluation.

Aggregate lending data from 2020 shows a total of 9,570 small business loans were originated by 89 lenders in the AA. GB ranked 8<sup>th</sup> among this group, with 3.7 percent of the total market share. GB also ranked 18<sup>th</sup> among 464 lenders originating home mortgage loans. Peer mortgage data from 2020, shows the bank with a total of 1.4 percent of the 54,487 mortgage loans originated. In addition, aggregate lending data from 2020 shows 14 lenders originated a total of 200 small farm loans. GB ranked 12<sup>th</sup> among this group, with a total of 0.5 percent market share.

#### **Geographic Distribution**

The geographic distribution of loans reflects adequate penetration throughout the AA. GB's good small business and adequate home mortgage lending performance support this conclusion.

##### *Small Business*

The geographic distribution of small business loans reflects good penetration throughout the AA. The bank's small business lending to low-income geographies was above D&B data and the rates reported by aggregate lenders in 2019 and consistent with these comparators in subsequent years. In moderate-income CTs, GB's performance was above D&B data and aggregate performance for each year. The institution's performance also demonstrated improvement in 2021.

### *Home Mortgage*

The geographic distribution of home mortgage loans reflects adequate penetration throughout the AA. GB's home mortgage lending in moderate-income areas was above demographic data and aggregate performance in 2019, and comparable in 2020 and 2021.

### **Borrower Profile**

The distribution of borrowers reflects adequate penetration among retail customers of different income levels and businesses of different sizes. Adequate lending performance for each loan product supports this conclusion.

### *Small Business*

The distribution of borrowers reflects adequate penetration to businesses with GARs of \$1 million or less. GB's lending to small businesses was below the rates reported by aggregate lenders in 2019, but surpassed aggregate performance in 2020. The institutions remained consistent in 2021.

### *Home Mortgage*

The distribution of borrowers reflects adequate penetration to LMI borrowers. GB's lending to low- and moderate-income borrowers was below aggregate performance throughout the evaluation period, but not to an unreasonable degree.

### **Community Development Loans**

GB is a leader in making CD loans in the Spokane AA where the bank originated 11 CD loans totaling \$45.0 million. This performance represents an increase since the last examination, when GB made 6 CD loans totaling \$36.5 million in the Spokane AA. GB primarily split its efforts targeting affordable housing and revitalization or stabilization opportunities.

GB's CD loan performance in the Spokane AA is consistent with the bank's performance in the State of Washington. The following table presents the bank's CD loans in the Spokane AA by year and CD purpose.

Community Development Lending – Spokane MSA										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2019	3	5,681	-	-	2	2,256	-	-	5	7,937
2020	1	3,193	-	-	-	-	-	-	1	3,193
2021	1	10,300	-	-	2	4,452	2	19,077	5	33,829
YTD 2022	-	-	-	-	-	-	-	-	-	-
<b>Total</b>	<b>5</b>	<b>19,174</b>	<b>-</b>	<b>-</b>	<b>4</b>	<b>6,708</b>	<b>2</b>	<b>19,077</b>	<b>11</b>	<b>44,959</b>
<i>Source: Bank Data</i>										

Notable examples of GB's CD loans in the Spokane AA include:

- In 2021, GB originated in an \$11.9 million revitalization loan in a moderate-income geography and Opportunity Zone in the AA for a mixed-use property, which consists primarily of businesses providing essential food services to the local population.
- In 2021, GB originated a \$10.3 million LIHTC loan that provided 71 units of affordable housing to LMI individuals and families in the AA.
- In 2019, GB originated two SBA 504 loans totaling \$2.3 million for the purchase and renovation of a local small business retailer's new facility which will create 10 new jobs for LMI workers in the AA.

## **INVESTMENT TEST**

GB has a relatively high level of qualified CD investments and grants in the Spokane AA, exhibits excellent responsiveness to credit and CD needs, and makes significant use of innovative and complex investments to support CD initiatives.

### **Investment and Grant Activity**

The institution has a relatively high level of qualified CD investments, grants, and donations, particularly those not routinely provided by private investors, occasionally in a leadership position. During the evaluation period, GB made \$10.8 million in new investments, continued to hold \$1.0 million in prior period investments, and provided \$181 thousand in donations that directly benefited the AA.

This level represents an increase from the prior evaluation when GB's qualified investments and donations totaled \$8.8 million. In addition, the majority of GB's investments focused on the provision of affordable housing, a primary CD need identified in the AA. The following table details the bank's investments and donations by year and CD purpose.

<b>Qualified Investments – Spokane MSA</b>										
<b>Activity Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Prior Period	2	1,032	-	-	-	-	-	-	2	1,032
2019	-	-	-	-	1	1,000	-	-	1	1,000
2020	2	6,565	-	-	-	-	-	-	2	6,565
2021	3	3,234	-	-	-	-	-	-	3	3,234
YTD 2022	-	-	-	-	-	-	-	-	-	-
<b>Subtotal</b>	<b>7</b>	<b>10,831</b>	<b>-</b>	<b>-</b>	<b>1</b>	<b>1,000</b>	<b>-</b>	<b>-</b>	<b>8</b>	<b>11,831</b>
Qualified Grants & Donations	4	18	39	110	2	3	1	50	46	181
<b>Total</b>	<b>11</b>	<b>10,849</b>	<b>39</b>	<b>110</b>	<b>3</b>	<b>1,003</b>	<b>1</b>	<b>50</b>	<b>54</b>	<b>12,012</b>
<i>Source: Bank Data</i>										

The following are notable examples of investments and donations made in the Spokane AA.

- In 2021, GB invested in a \$2.0 million LIHTC investment that provided 297 units of affordable housing to LMI individuals and families in the AA.
- In 2020, GB funded a \$1.5 million LIHTC investment that provided 120 units of affordable housing to LMI individuals and families in the AA.
- From 2019 to 2022, GB provided sponsorships for students from primarily LMI schools within the AA for the Everfi financial education course totaling \$19 thousand.

### **Responsiveness to Credit and Community Development Needs**

GB exhibits excellent responsiveness to credit and CD needs. The bank demonstrated responsiveness to the Spokane AA through its focus on funding investments targeting the identified community need of affordable housing. Overall, GB funded \$10.8 million in qualified investments targeted to affordable housing needs.

### **Community Development Initiatives**

GB makes significant use of innovative and complex investments in the Spokane AA to support CD initiatives. In this AA, the bank funded 2 LIHTC investments totaling \$3.5 million and 2 EQ2 investments totaling \$2.0 million. Refer to the bank-wide Community Development Initiatives for further details on the bank's initiatives.

### **SERVICE TEST**

Delivery systems are accessible to essentially all portions of the Spokane AA. Services, including business hours, do not vary in a way that inconveniences certain portions of the AA, particularly LMI geographies and/or individuals. GB provides an adequate level of CD services in the AA. GB did not open or close any branches in the AA during the evaluation period; as such, this criterion did not affect conclusions for the AA.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the institution's AA. GB operates four full-service branches in the Spokane AA. The bank does not have any branches located in low-income tracts, which is not unreasonable compared to all other institutions combined, which operate less than 1.0 percent of their branches in these geographies. The bank has two branches located in a moderate-income geography. This compares favorably to the percentage of other institutions operating in these geographies. GB's branch structure in moderate-income CTs is also above the percentage of households, families, and businesses in this area. The remaining two branches are located in a middle-income geography.

### **Changes in Branch Locations**

GB did not open or close any branches in the AA during the evaluation period; as such, this criterion did not affect conclusions for the AA.

### **Reasonableness of Business Hours and Services**

Services, including business hours, do not vary in a way that inconveniences certain portions of the AA, particularly LMI geographies and/or individuals. Neither branch in the Spokane AA offer Saturday hours, and the Spokane Valley branch, located in a moderate-income geography, offers drive-up banking.

### **Community Development Services**

The bank provides an adequate level of CD services in the Spokane AA. During the evaluation period, bank staff provided 299 hours of qualified CD services.

Service hours decreased from the prior evaluation, when GB employees provided 521 hours to the AA. Services activities primarily targeted community services and affordable housing. The following table details the institution's CD services by year and CD purpose.

<b>Community Development Services – Spokane MSA</b>					
<b>Activity Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b># Hours</b>	<b># Hours</b>	<b># Hours</b>	<b># Hours</b>	<b># Hours</b>
2019	43	49	-	-	<b>92</b>
2020	24	34	-	-	<b>58</b>
2021	37	22	-	-	<b>59</b>
YTD 2022	39	51	-	-	<b>90</b>
<b>Total</b>	<b>143</b>	<b>156</b>	-	-	<b>299</b>
<i>Source: Bank Data</i>					

Notable examples of CD services in the Spokane AA include:

- From 2019 to 2022, an Officer of the bank contributed 97 hours serving on the Board for a local affordable housing organization in the AA.
- In 2019, a GB loan officer contributed seven community services hours teaching financial literacy classes at two elementary schools that consists primarily of LMI students in the AA.
- From 2019 to 2022, a GB manager contributed 50 hours serving on the Board of a local non-profit that provides essential community services to at-risk LMI youth in the AA.

## OTHER ASSESSMENT AREAS – Limited-Scope Review

### CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED-SCOPE ASSESSMENT AREAS

The following table summarizes performance in each limited-scope AA as compared to performance in the State of Arizona AA in which full-scope procedures were conducted. The conclusions are based on a review of available facts and data, aggregate lending comparisons and demographic information. The conclusions from the areas reviewed using limited-scope procedures did not impact or alter the institution's overall performance rating.

Assessment Area	Lending Test	Investment Test	Service Test
Wenatchee MSA	Exceeds	Consistent	Consistent
Non-MSA	Exceeds	Below	Consistent

The following facts and data support the conclusions for the AA. Also included are details regarding the number and dollar volume of small business, home mortgage, small farm, and community development loans originated during the review period; qualified investments (new and prior period) and donations during the review period; and community development services for the review period. Unless otherwise noted, Branch distribution and service hours are consistent with Washington overall, and products, services, and alternative delivery systems are discussed at the institution level. Additional information is in the Limited-Scope Assessment Areas Appendices.

#### Wenatchee

GB operates four branches in the Wenatchee MSA AA, all located in middle-income tracts. The bank did not open or close any branches in the AA during the review period. The following table details the bank's activities in this AA.

Activity	#	\$
Small Business Loans	528	62,103
Home Mortgage Loans	342	120,306
Small Farm Loans	175	25,223
Community Development Loans	8	10,651
Investments (New)	9	5,644
Investments (Prior Period)	2	1,007
Donations	30	143
CD Services	287	-
<i>Source: Bank Data</i>		

#### Non-MSA

GB operates five branches in the Washington Non-MSA AA, all in middle-income tracts. The bank did not open or close any branches in the AA during the evaluation period. The following table details the bank's activities in this AA.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	529	34,146
Home Mortgage Loans	206	43,533
Small Farm Loans	138	13,236
Community Development Loans	18	26,439
Investments (New)	8	2,556
Investments (Prior Period)	1	504
Donations	23	71
CD Services	75	-
<i>Source: Bank Data</i>		

## NEVADA

### CRA RATING FOR NEVADA: SATISFACTORY

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN NEVADA

GB operates within Carson City, Douglas, and Washoe Counties in the State of Nevada. These three counties represent a portion of the Reno-Carson City-Fernley CSA #456. GB entered into the Nevada market and introduced this AA in 2020. See the following for key demographic and economic information.

#### Economic and Demographic Data

The AA consists of 10 low-, 25 moderate-, 53 middle-, and 46 upper-income CTs. Nine additional CTs in the AA do not have an income designation. See the following table.

Demographic Information of the Assessment Area						
Assessment Area: GB NV Reno Carson City CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	143	7.0	17.5	37.1	32.2	6.3
Population by Geography	536,760	7.0	19.3	41.5	31.1	1.1
Housing Units by Geography	233,661	7.8	19.7	39.2	32.4	0.9
Owner-Occupied Units by Geography	120,309	2.1	13.0	43.2	41.5	0.3
Occupied Rental Units by Geography	87,409	14.9	29.2	36.9	17.5	1.5
Vacant Units by Geography	25,943	10.2	18.7	28.7	40.6	1.9
Businesses by Geography	38,977	6.9	22.2	29.3	37.5	4.1
Farms by Geography	951	4.9	15.7	39.0	39.3	1.1
Family Distribution by Income Level	129,414	20.8	17.2	20.7	41.3	0.0
Household Distribution by Income Level	207,718	24.1	15.7	17.7	42.5	0.0
Median Family Income MSA - 16180 Carson City, NV MSA		\$58,947	Median Housing Value			\$228,110
Median Family Income MSA - 39900 Reno, NV MSA		\$65,722	Median Gross Rent			\$941
Median Family Income Non-MSAs - NV		\$61,350	Families Below Poverty Level			10.0%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						



According to Moody’s Analytics, the AA economy is in the middle of an expansion phase with broad based strength across industries. The area’s budding tech hub is bringing more mid- to high-wage jobs and industrial diversity to the local economy. The metro area is already home to a Tesla Gigafactory and Google data center. The travel and gaming industries are performing well; however it will take years for the leisure and hospitality sectors to rebuild payrolls to their pre-pandemic level. The housing market has seen low mortgage rates and an influx of out-of-state buyers, which boosted demand over the last two years. Coupled with low supply, this sent single-family house prices soaring to record highs.

University of Nevada-Reno, Silver Legacy Resort Casino, Sierra Nevada Healthcare System, Harrah’s Reno Casino, and St. Mary’s Health Network are among the area’s largest employers. Unemployment levels in the AA vary, but demonstrate improvement since the peak levels observed during the height of the pandemic. The following table illustrates unemployment levels for the county compared to Nevada and the nation.

<b>Unemployment Rates – Reno-Carson City-Fernley CSA</b>			
<b>Area</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
	<b>%</b>	<b>%</b>	<b>%</b>
Carson City County	4.1	8.6	4.8
Douglas County	4.0	8.9	4.5
Washoe County	3.3	8.2	4.3
Nevada	4.0	13.5	7.2
National Average	3.7	8.1	5.3
<i>Source: Bureau of Labor Statistics</i>			

### **Competition**

There is a moderately high level of competition among financial institutions in the AA. According to the June 30, 2021 Deposit Market Share Report, GB ranked 6<sup>th</sup> out of 17 FDIC-insured institutions competing within the AA, with a total of 5.6 percent of the deposit market share. According to the same data, the bank has 5 out of 111 branches in the AA. The top three institutions are comprised of large regional and national associations and have a combined market share of 65.5 percent.

### **Community Contact**

Examiners reviewed a community contact with an organization that focuses on affordable housing and community development programs in the AA. The organization helps develop and preserve affordable rental units and homeownership opportunities. According to the contact, the AA was negatively impacted during the pandemic due to required shutdowns as more than 65.0 percent of the workforce is employed by casinos in the entertainment and gaming industries. Prior to the pandemic, the area was trying to diversify into other industries such as healthcare and technology-based companies, and expanding small business ownership. The contact noted that despite these challenges, the economy appears to be rebounding as companies reopening or reinventing the way they do business. The contact stated that the majority of the organization’s clients seeking assistance

fall below 60.0 percent of the area median income level, which presents a challenge for finding affordable housing solutions with limited stock available. Overall, there is also a lack of access to financial education. A pilot program for providing financial education was abandoned as coordinating client participation was not successful.

### **Credit and Community Development Needs and Opportunities**

Considering community contact information and key economic and demographic data indicators, access to affordable housing represents a primary credit need for the AA. There are also opportunities for providing financial education training and funding programs. Funding for small business start-ups and expansion are also present, as the local area continues to try and diversify and stabilize the economy that is so heavily dependent on the entertainment and tourism industries.

## **SCOPE OF EVALUATION – NEVADA**

Consistent with the overall Scope of Evaluation, home mortgage and small business loan products were analyzed for the State of Nevada, with the greatest consideration given to small business loans. GB did not originate any small farm loans in Nevada during the evaluation. The Nevada AA is new to GB at this evaluation and the overall rating for the state provided limited weight in developing overall conclusions. Lending analysis is limited to 2020 and 2021.

<b>Assessment Area Breakdown of Loans, Deposits, and Branches</b>						
<b>Assessment Area</b>	<b>Loans</b>		<b>Deposits</b>		<b>Branches</b>	
	<b>\$(000s)</b>	<b>% Bank Total</b>	<b>\$(000s)</b>	<b>% Bank Total</b>	<b>#</b>	<b>% Bank Total</b>
<b>Reno-Carson City-Fernley</b>	296,171	2.4	1,021,539	6.0	7	3.7
<i>Source: Bank Records, FDIC Summary of Deposits (6/30/2021)</i>						

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN NEVADA**

### **LENDING TEST**

GB's lending levels reflect adequate responsiveness to AA credit needs. The geographic distribution of loans reflects good penetration. The distribution of borrowers reflects adequate penetration among individuals and businesses. GB is a leader in making CD loans in the AA.

### **Lending Activity**

GB's lending levels reflect adequate responsiveness to AA credit needs. During the review period, GB originated 1,632 small business loans totaling \$221.7 million, 194 home mortgage loans totaling \$74.4 million, and no small farm loans.

Aggregate lending data from 2020 shows a total of 16,689 small business loans were originated by 158 lenders in the AA. GB ranked 6<sup>th</sup> among this group, with 6.2 percent of the total market share.

GB also ranked 67<sup>th</sup> among 495 lenders originating home mortgage loans. Peer mortgage data from 2020, shows the bank with a total of 0.3 percent of the 69,885 mortgage loans originated.

### **Geographic Distribution**

The geographic distribution of loans reflects good penetration throughout the AA. GB's excellent small business and adequate home mortgage lending performance support this conclusion.

#### *Small Business*

The geographic distribution of small business loans reflects excellent penetration throughout the AA. The bank's small business lending to low-income geographies was above D&B data and the rates reported by aggregate lenders during the review period. In moderate-income CTs, GB's performance was well above D&B data and aggregate performance for each year.

#### *Home Mortgage*

The geographic distribution of home mortgage loans reflects adequate penetration throughout the AA. GB's home mortgage lending in low-income CTs was slightly below demographic data, but comparable to aggregate performance in 2020. The institution's performance in 2021 registered a slight decrease, but not to an unreasonable degree.

### **Borrower Profile**

The distribution of borrowers reflects adequate penetration among retail customers of different income levels and businesses of different sizes. Adequate lending performance for each loan product supports this conclusion.

#### *Small Business*

The distribution of borrowers reflects adequate penetration to businesses with GARs of \$1 million or less. GB's lending to small businesses was below the rates reported by aggregate lenders in 2020, but showed dramatic improvement in 2021. Comparable aggregate data was not available for 2021.

#### *Home Mortgage*

The distribution of borrowers reflects adequate penetration to LMI borrowers. GB's lending to low-income borrowers was slightly below aggregate performance in 2020, but showed improvement in 2021. Performance of lending to moderate-income borrowers was similar and was lower than the aggregate in 2020 and improving in 2021. Examiners considered the fact that GB does not have a significant portion of the market share among other home mortgage loan originators in this competitive market.

### **Community Development Loans**

GB is a leader in making CD loans in Nevada. The bank originated 17 CD loans totaling \$41.3 million during the review period. In addition, GB contributed lending in each CD purpose with the majority of its CD lending targeting economic development. The State of Nevada was not evaluated as part of the previous examination; therefore, no trend analysis was conducted for the current evaluation.

The following table presents the bank’s CD loans in the State of Nevada by year and CD purpose. Refer to each individual AA for specific details and notable examples.

<b>Community Development Lending – State of Nevada</b>										
<b>Activity Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
2019	-	-	-	-	-	-	-	-	-	-
2020	-	-	-	-	5	14,111	-	-	5	14,111
2021	1	7,000	1	1,850	5	8,718	1	1,700	8	19,268
YTD 2022	-	-	1	1,100	3	6,795	-	-	4	7,895
<b>Total</b>	<b>1</b>	<b>7,000</b>	<b>2</b>	<b>2,950</b>	<b>13</b>	<b>29,624</b>	<b>1</b>	<b>1,700</b>	<b>17</b>	<b>41,274</b>
<i>Source: Bank Data</i>										

Notable examples of GB’s CD loans in Nevada include:

- In 2021, GB originated a \$7.0 million LIHTC loan that provided 34 units of affordable housing in the AA.
- In 2021, GB originated a \$3.8 million SBA 504 loan to a women-owned small business eatery that created 30 jobs for LMI workers in the AA.
- In 2022, GB originated a \$1.1 million loan to an organization that provides therapy services to primarily LMI individuals in the AA.

## **INVESTMENT TEST**

GB is rated “Outstanding” in the Investment Test in the State of Nevada. The bank has an excellent level of qualified CD investments and grants in the State of Nevada, exhibits excellent responsiveness to credit and CD needs, and occasionally uses innovative or complex investments to support CD initiatives.

### **Investment and Grant Activity**

The bank has an excellent level of qualified CD investments and grants throughout Nevada, particularly those not routinely provided by private investors, often in a leadership position. GB reported a total of \$8.4 million in total qualified investments and grants. This total includes \$69 thousand in grants or donations, including one donation for \$10 thousand to an organization providing benefits to a broader regional area.

The State of Nevada was not evaluated as part of the previous examination; therefore, no trend analysis was conducted for the current evaluation. The majority of GB’s qualified investments targeted affordable housing, an identified CD need for the AAs. The following table details the bank’s qualified investments, grants, and donations by year and CD purpose.

Qualified Investments – State of Nevada										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	-	-	-	-	-	-	-	-	-	-
2019	-	-	-	-	-	-	-	-	-	-
2020	-	-	-	-	-	-	-	-	-	-
2021	1	2,000	-	-	-	-	-	-	1	2,000
YTD 2022	5	6,310	-	-	-	-	-	-	5	6,310
<b>Subtotal</b>	<b>6</b>	<b>8,310</b>	-	-	-	-	-	-	<b>6</b>	<b>8,310</b>
Qualified Grants & Donations	-	-	22	69	-	-	-	-	22	69
<b>Total</b>	<b>6</b>	<b>8,310</b>	<b>22</b>	<b>69</b>	-	-	-	-	<b>28</b>	<b>8,379</b>
<i>Source: Bank Data</i>										

The following are notable examples of investments and donations made in the State of Nevada:

- In 2021, GB invested in a \$2.0 million LIHTC investment that provided 35 units of affordable housing to LMI individuals and families in the AA.
- In 2022, GB funded five investments totaling \$6.3 million in mortgage-backed securities targeted towards affordable housing and in which the underlying mortgages all targeted LMI borrowers in the AA.

### **Responsiveness to Credit and Community Development Needs**

GB exhibits excellent responsiveness to credit and CD needs. The bank demonstrated responsiveness to the State of Nevada through its focus on funding investments targeting the identified community need of affordable housing. Overall, GB funded \$8.3 million in qualified investments targeted to affordable housing needs.

### **Community Development Initiatives**

GB makes significant use of innovative and complex investments in the State of Nevada to support CD initiatives. In Nevada, the bank funded one LIHTC investments totaling \$2.0 million. Refer to the bank-wide Community Development Initiatives for further details on the bank's initiatives.

### **SERVICE TEST**

GB is rated "High Satisfactory" in the Service Test in the State of Nevada.

### **Accessibility of Delivery Systems**

Delivery systems are reasonably accessible to essentially all portions of the institution's AA. The bank operates seven full-service branches in Nevada. One is located in a low-income geography, which exceeds the branch distribution of other institutions. This performance level also exceeds the

percentage of AA families and households and percentage of businesses that are located in low-income geographies. GB also operates a branch in a moderate-income geography, which trails the distribution of other institutions operating in the same geographies. This performance level also trails the percentage of families and households and businesses that are located in moderate-income geographies. The bank also operates 3 branches in the AA's middle-income geographies, a branch in an upper-income geography, and a branch in a geography that does not have an income designation due to nominal population.

### **Changes in Branch Locations**

The institution's record of opening and closing of branches has improved the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the evaluation period the bank opened seven new branches in the AA as a result of an acquisition of Heritage Bank of Nevada. Of these, one branch was opened in a low-income geography, and two branches were opened in a moderate-income geography. In addition, one branch was opened in a middle income geography, two branches were opened in an upper-income geography, and one branch was opened in geography that does not have an income designation due to a limited population. GB did not close any branches in the AA during the evaluation period.

### **Reasonableness of Business Hours and Services**

Services, including business hours, do not vary in a way that inconveniences certain portions of the AA, particularly LMI geographies and/or individuals. Services and business hours are identical among each Nevada branch. All branches have drive-up facilities, and no branches are open on weekend days.

### **Community Development Services**

GB provides a relatively high level of CD services in the State of Nevada. Bank staff provided 660 CD services hours to organizations throughout the review period. The great majority of service activity targeted community services for LMI populations. In addition, 154 CD service hours contributed by bank staff benefitted organizations serving a broader regional area. The following table details the bank's CD services in the State of Nevada by year and CD purpose.

<b>Community Development Services – State of Nevada</b>					
<b>Activity Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b># Hours</b>	<b># Hours</b>	<b># Hours</b>	<b># Hours</b>	<b># Hours</b>
2019	-	-	-	-	-
2020	20	162	-	-	<b>182</b>
2021	28	339	-	-	<b>367</b>
YTD 2022	-	110	1	-	<b>111</b>
<b>Total</b>	<b>48</b>	<b>611</b>	<b>1</b>	<b>-</b>	<b>660</b>
<i>Source: Bank Data</i>					

Notable examples of CD services in the State of Nevada include:

- From 2020 to 2022, a GB manager contributed 254 hours serving on the Board for a local service organization providing food to LMI individuals and families in the AA.
- From 2020 to 2022, a GB executive contributed 124 hours serving on the Board for an organization providing community services and programs to LMI individuals and families in the AA.
- From 2020 to 2022, a GB Assistant Vice President contributed 65 hours serving on the Board of a local organization that provides community services to at-risk LMI children in the AA.

## UTAH

### CRA RATING FOR UTAH: SATISFACTORY

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN UTAH

GB operates within two AAs in the State of Utah see the following table. The bank made several changes to the AA since the prior evaluation. In 2019, Davis and Weber Counties were added to the Ogden-Clearfield AA. Salt Lake County was added to the Salt Lake City-Provo-Orem AA in 2019, and Utah County was added in 2022. In 2022, GB also added Washington County to the AA, which represents the St. George MSA AA. Due to the late addition and lack of available lending data, this AA is only included to capture any CD activities that occurred during the evaluation period.

Description of Assessment Areas		
Assessment Area	Counties in Assessment Area	# of CTs
Ogden-Clearfield	Box Elder, Davis, Morgan, Weber	117
Salt-Lake City-Provo-Orem	Salt Lake, Summit, Utah	225
Source: Bank Data		

### SCOPE OF EVALUATION – UTAH

Consistent with the overall Scope of Evaluation, home mortgage, small business, and small farm loan products were analyzed for the Utah AAs, with the greatest consideration given to home mortgage and small business loans.

The Ogden-Clearfield AA had the largest amount of lending activity by number of home mortgage and small business loan originations in the State of Utah. Based on the number of loan originations and deposit volume, the Ogden-Clearfield AA was evaluated using full-scope examination procedures and carries greater weight in determining ratings for the State of Utah. The Salt Lake City-Provo-Orem AA was evaluated using limited-scope examination procedures.

Assessment Area Breakdown of Loans, Deposits, and Branches						
Assessment Area	Loans		Deposits		Branches	
	\$(000s)	% Bank Total	\$(000s)	% Bank Total	#	% Bank Total
Ogden-Clearfield	171,571	1.4	536,288	3.2	10	5.2
Salt Lake City-Provo-Orem	197,326	1.6	131,003	0.8	20	10.4
Utah	368,897	3.0	667,291	4.0	30	15.4
Source: Bank Records, FDIC Summary of Deposits (6/30/2021)						



## **CONCLUSIONS ON PERFORMANCE CRITERIA IN UTAH**

### **LENDING TEST**

GB is rated “High Satisfactory” in the Lending Test for the State of Utah. The bank’s performance in each Utah AA was consistent with this conclusion.

#### **Lending Activity**

GB’s lending levels reflect adequate responsiveness to AA credit needs. Refer to each Utah AA analysis for details.

#### **Geographic Distribution**

The geographic distribution of loans reflects adequate penetration throughout the Utah AAs. This performance is consistent in each AA reviewed.

#### **Borrower Profile**

The distribution of borrower in Utah reflects good penetration. The banks performance is consistent for both AAs in Utah.

#### **Community Development Loans**

GB is a leader in making CD loans in the Utah AAs. The bank originated 44 CD loans totaling \$127.5 million in the State of Utah, which includes 3 regional CD loans totaling \$17.4 million during the evaluation period. This performance represents a significant increase since the last examination, when GB made 3 CD loans totaling \$2.8 million. In addition, GB primarily targeted economic development opportunities through the review period with 19 loans totaling \$52.9 million.

Performance was consistent throughout the Utah AAs except for the St. George AA, where the bank did not have any activity. The Ogden AA weighed most heavily in forming conclusions. The following table presents the bank’s CD loans in the State of Utah by year and CD purpose. Refer to each individual AA for specific details and notable examples.

Community Development Lending – State of Utah										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2019	2	8,840	-	-	-	-	-	-	2	8,840
2020	5	12,633	-	-	5	15,200	5	20,051	15	47,884
2021	2	5,152	1	182	10	13,551	7	22,404	20	41,289
YTD 2022	2	1,339	-	-	4	24,107	1	4,000	7	29,446
<b>Total</b>	<b>11</b>	<b>27,963</b>	<b>1</b>	<b>182</b>	<b>19</b>	<b>52,859</b>	<b>13</b>	<b>46,455</b>	<b>44</b>	<b>127,459</b>
<i>Source: Bank Data</i>										

Notable examples of GB’s CD loans in Utah that aren’t attributable to a specific AA include:

- In 2021, GB originated a \$13.9 million SBA 504 loan to a small business outside the bank’s AAs for a second facility in a moderate-income geography that will create six new jobs for LMI workers.
- In 2020, GB originated two LIHTC loans outside the bank’s AAs totaling \$3.5 million that provided 46 units in total of affordable housing to LMI individuals and families.

## INVESTMENT TEST

GB is rated “Outstanding” in the Investment Test in the State of Utah. The bank’s performance in the Salt Lake AA was consistent with this conclusion, while the Ogden AA’s performance was below that of the overall conclusion.

### Investment and Grant Activity

The bank has an excellent level of qualified CD investments and grants throughout the Montana AAs, particularly those not routinely provided by private investors, often in a leadership position. GB reported a total of \$19.7 million in total qualified investments and grants. This total includes \$191 thousand in grants or donations and approximately \$75 thousand in prior period investments.

This is a significant increase from the prior evaluation, when GB’s qualified investments and donations totaled approximately \$1.1 million. In addition, almost all of GB’s qualified investments and grants or donations targeted affordable housing, an identified CD need for the AAs. The following table details the bank’s qualified investments, grants, and donations by year and CD purpose.

Qualified Investments – State of Utah										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	2	75	-	-	-	-	-	-	2	75
2019	1	3,333	-	-	-	-	-	-	1	3,333
2020	-	-	-	-	-	-	-	-	-	-
2021	3	3,873	-	-	-	-	-	-	3	3,873
YTD 2022	2	12,220	-	-	-	-	-	-	2	12,220
<b>Subtotal</b>	<b>8</b>	<b>19,502</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>8</b>	<b>19,502</b>
Qualified Grants & Donations	8	26	46	152	2	13	-	-	56	191
<b>Total</b>	<b>16</b>	<b>19,528</b>	<b>46</b>	<b>152</b>	<b>2</b>	<b>13</b>	<b>-</b>	<b>-</b>	<b>64</b>	<b>19,693</b>
<i>Source: Bank Data</i>										

### **Responsiveness to Credit and Community Development Needs**

GB exhibits excellent responsiveness to credit and CD needs. The bank demonstrated responsiveness to its Utah AAs through its focus on funding investments targeting the identified community need of affordable housing. Overall, GB funded \$19.5 million in qualified investments targeted to affordable housing needs.

### **Community Development Initiatives**

GB makes significant use of innovative and complex investments in the Utah AAs to support CD initiatives. In the Utah AAs, the bank funded 3 LIHTC investments totaling \$6.1 million. Refer to the bank-wide Community Development Initiatives for further details on the bank's initiatives.

### **SERVICE TEST**

GB is rated "High Satisfactory" in the Service Test in the State of Utah. The bank's performance in The Ogden-Clearfield AA was consistent with this conclusion. GB's performance in the Salt Lake AA was above the overall performance conclusion.

### **Accessibility of Delivery Systems**

Delivery systems are reasonably accessible to essentially all portions of the institution's Utah AAs. GB operates 29 full-service branches located throughout the bank's Utah AAs. Of these, one branch is located in a low-income geography, and four branches are located in moderate-income geographies. Additionally, 18 branches are located in middle-income geographies, and 6 branches are located in upper-income tracts. Refer to each full- and limited-scope analysis for details.

### **Changes in Branch Locations**

To the extent changes have been made, the institution's opening and closing of branches has improved the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI

individuals. During the evaluation period, the bank opened 20 new branches through an acquisition of Altabank. Of these, 1 branch is located in a low-income CT, 2 are located in moderate-income CTs, 13 are located in middle-income CTs, and 4 are located in upper-income CTs. Refer to each full- and limited-scope analysis for complete details regarding the changes in branch locations.

### **Reasonableness of Business Hours and Services**

Services, including business hours, do not vary in a way that inconveniences the AAs, particularly LMI geographies and/or individuals. All of the bank's products and services are available at all of the branches in the AA. All but 3 branches offer drive-up service, and 13 branches have Saturday hours

### **Community Development Services**

GB provides a relatively high level of CD services in its Utah AAs. Bank staff provided 699 CD services hours to organizations throughout the review period. The volume of CD service hours in the Utah AAs increased 90.0 percent since the previous evaluation where the bank totaled 368 service hours. The great majority of service activity targeted community services for LMI populations and were provided in the Ogden AA. The following table details the bank's CD services in the Utah AAs by year and CD purpose. Refer to each full- and limited-scope analysis for further detail.

<b>Community Development Services – State of Utah</b>					
<b>Activity Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b># Hours</b>	<b># Hours</b>	<b># Hours</b>	<b># Hours</b>	<b># Hours</b>
2019	4	7	-	-	<b>11</b>
2020	15	122	-	-	<b>137</b>
2021	22	128	-	-	<b>150</b>
YTD 2022	-	393	8	-	<b>401</b>
<b>Total</b>	<b>41</b>	<b>650</b>	<b>8</b>	<b>-</b>	<b>699</b>
<i>Source: Bank Data</i>					

## **OGDEN-CLEARFIELD– Full-Scope Review**

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN OGDEN-CLEARFIELD**

The Ogden-Clearfield AA consists of all 117 CTs in Box Elder, Davis, Morgan, and Weber Counties, which comprise the Ogden-Clearfield MSA #36260 in its entirety. Since the previous evaluation, GB expanded this AA in 2019, with the addition of Davis and Weber Counties.

### **Economic and Demographic Data**

The AA consists of 5 low-, 30 moderate-, 50 middle-, and 32 upper-income CTs. See the following table for additional demographic information.

Demographic Information of the Assessment Area						
Assessment Area: GB UT Ogden Clearfield MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	117	4.3	25.6	42.7	27.4	0.0
Population by Geography	623,323	1.8	21.2	45.4	31.7	0.0
Housing Units by Geography	210,381	2.2	23.9	46.0	28.0	0.0
Owner-Occupied Units by Geography	147,982	0.9	17.5	48.0	33.5	0.0
Occupied Rental Units by Geography	49,493	5.4	41.5	39.3	13.8	0.0
Vacant Units by Geography	12,906	4.4	28.8	47.6	19.3	0.0
Businesses by Geography	56,891	4.3	16.5	42.1	37.1	0.0
Farms by Geography	1,685	2.5	14.5	49.6	33.4	0.0
Family Distribution by Income Level	154,078	17.6	19.3	24.1	39.1	0.0
Household Distribution by Income Level	197,475	21.0	17.3	22.1	39.6	0.0
Median Family Income MSA - 36260 Ogden-Clearfield, UT MSA		\$71,742	Median Housing Value			\$202,315
			Median Gross Rent			\$848
			Families Below Poverty Level			7.6%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

According to Moody's Analytics, Ogden-Clearfield's economy remains one of the strongest in the nation. The housing market is benefiting from the thriving labor market and strong population gains. House prices are rising more quickly than the state and national averages, which is prompting homebuilders to continue their rapid pace of new-home construction. In addition, the receding pandemic is boosting tourism. Hill Air Force Base is the metro area's largest employer and has been responsible for the bulk of high-paying public and private sector jobs in recent years. Department of Treasury, McKay-Dee Hospital Center, Weber State University, and Autoliv ASP Inc. are also among the area's largest employers. Unemployment levels in the AA are generally consistent with state and below national averages. The following table illustrates unemployment levels for the county compared to Washington and the nation.

Unemployment Rates – Ogden-Clearfield MSA			
Area	2019	2020	2021
	%	%	%
Box Elder County	2.6	4.4	2.4
Davis County	2.4	4.1	2.4
Morgan County	2.4	3.4	2.1
Weber County	2.9	4.9	2.9
Utah	2.6	4.7	2.7
National Average	3.7	8.1	5.3
<i>Source: Bureau of Labor Statistics</i>			

### **Competition**

There is a moderate level of competition among financial institutions in the AA. According to the June 30, 2021 Deposit Market Share Report, GB ranked 6<sup>th</sup> out of 15 FDIC-insured institutions competing within the AA, with a total of 6.5 percent of the deposit market share. According to the same data, the bank has 8 out of 87 branches in the AA. The top three institutions are comprised of large regional and national associations and have a combined market share of 53.9 percent.

### **Community Contact(s)**

Examiners conducted a community contact with an organization that provides consultation to small businesses and entrepreneurs from business development to growth. According to the contact, the AA was not as impacted as others during the pandemic. PPP loans helped retain many local businesses and the large presence of military and government employees served to stabilize the economy. The contact stated that after marketing, financial support was the second most requested service among clients. The contact also noted that minority owned businesses appeared to be the most impacted among small businesses entrepreneurs.

### **Credit and Community Development Needs and Opportunities**

Considering community contact information and key economic and demographic data indicators, access to funding and financial education for small business entrepreneurs appears to be a primary credit need for the AA. Indicators also suggest opportunities for providing support for affordable housing in the AA's rapidly expanding market.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN OGDEN-CLEARFIELD**

### **LENDING TEST**

GB's lending levels reflect adequate responsiveness to AA credit needs. The geographic distribution of loans reflects adequate penetration. The distribution of borrowers reflects good penetration among individuals and businesses. GB is a leader in making CD loans in the AA.

## **Lending Activity**

GB's lending levels reflect adequate responsiveness to AA credit needs. During the review period, GB originated 568 small business loans totaling \$62.6 million, 317 home mortgage loans totaling \$106.1 million, and 38 small farm loans totaling \$2.4 million. In the prior evaluation, the bank was noted as having poor responsiveness to AA credit needs. GB originated 83 small business loans totaling \$6.9 million, 43 home mortgage loans totaling \$9.8 million, and 45 small farm loans totaling \$2.2 million. The increase in overall lending activity demonstrates improvement and although the bank's market share rank has not changed appreciably, the pool of lenders among which GB is ranked grew significantly.

Aggregate lending data from 2020 shows a total of 12,191 small business loans were originated by 109 lenders in the AA. GB ranked 9<sup>th</sup> among this group, with 3.0 percent of the total market share. GB ranked 26<sup>th</sup> among 236 lenders originating home mortgage loans. Peer mortgage data from 2020, shows the bank with a total of 0.9 percent of the 8,667 mortgage loans originated. In addition, aggregate lending data from 2020 shows 17 lenders originated a total of 210 small farm loans. GB ranked 16<sup>th</sup> among this group, with a total of 8.1 percent market share.

## **Geographic Distribution**

The geographic distribution of loans reflects adequate penetration throughout the AA. GB's adequate small business and home mortgage lending performance support this conclusion.

### *Small Business*

The geographic distribution of small business loans reflects adequate penetration throughout the AA. The bank's small business lending to low-income geographies was poor. GB's made no loans in low-income geographies in 2019. In 2020, the institution's rate of lending was below the aggregate and D&B data for the same time period. Performance in 2021 registered a decline. In 2019, GB's performance in moderate-income CTs was well below the aggregate. However, in 2020, performance improved and surpassed both D&B and aggregate data. In 2021, the institution's performance declined slightly, but remained about D&B data.

### *Home Mortgage*

The geographic distribution of home mortgage loans reflects adequate penetration throughout the AA. GB's home mortgage lending in low-income areas was more than double the rates achieved by the aggregate and above demographic throughout the evaluation period. In moderate-income areas, GB's performance was significantly below the rates reported by the aggregate in 2019 and 2020. Performance in 2021 improved to a large degree and surpassed demographic data.

## **Borrower Profile**

The distribution of borrowers reflects good penetration among retail customers of different income levels and businesses of different sizes. Excellent small business and adequate home mortgage performance support this conclusion.

### *Small Business*

The distribution of borrowers reflects excellent penetration to businesses with GARs of \$1 million or less. GB's lending to small businesses was well above the rates reported by aggregate lenders in 2019 and 2020. The institution maintained stable performance in 2021.

### *Home Mortgage*

The distribution of borrowers reflects adequate penetration to LMI borrowers. GB's lending to low-income borrowers was generally comparable to aggregate performance in 2019 and 2020 and remained stable in 2021. GB's performance of lending to moderate-income borrowers was consistent with aggregate lenders and demographic data in 2019 and 2020. In 2021, the institution's performance declined to a degree, but was only slightly below demographic data.

### **Community Development Loans**

GB is a leader in making CD loans in the Ogden AA where the bank originated 17 CD loans totaling \$34.9 million. This performance represents a significant increase since the last examination, when GB did not have any CD loan activity in the Ogden AA. The great majority of CD lending in the AA promoted economic development, although some activity targeted affordable housing and revitalization efforts.

GB's CD loan performance in the Ogden AA is consistent with the bank's performance in the State of Utah. The following table presents the bank's CD loans in the Ogden AA by year and CD purpose.

<b>Community Development Lending – Ogden MSA</b>										
<b>Activity Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
2019	-	-	-	-	-	-	-	-	-	-
2020	1	500	-	-	1	529	1	1,833	3	2,863
2021	-	-	-	-	6	6,527	2	33	8	6,560
YTD 2022	2	1,339	-	-	4	24,107	-	-	6	25,446
<b>Total</b>	<b>3</b>	<b>1,839</b>	<b>-</b>	<b>-</b>	<b>11</b>	<b>31,164</b>	<b>3</b>	<b>1,866</b>	<b>17</b>	<b>34,869</b>
<i>Source: Bank Data</i>										

Notable examples of GB's CD loans in the Ogden AA include:

- In 2022, GB originated a \$10.0 million economic development loan to a small business for facility improvements and to retain 8 jobs held by LMI workers in the AA.
- In 2021, GB originated a \$1.9 million SBA 504 loan to a small auto business that created 4 new jobs for LMI workers in the AA.
- In 2020, GB originated a \$1.8 million PPP loan to revitalize or stabilize a business in need as a result of the Covid-19 pandemic in a moderate-income geography in the AA.



## **INVESTMENT TEST**

GB has a relatively high level of qualified CD investments and grants in the Ogden AA, exhibits excellent responsiveness to credit and CD needs, and occasionally uses innovative and complex investments to support CD initiatives.

### **Investment and Grant Activity**

The institution has a relatively high level of qualified CD investments, grants, and donations, particularly those not routinely provided by private investors, occasionally in a leadership position. During the evaluation period, GB made \$3.1 million in new investments, continued to hold \$75 thousand in prior period investments, and provided \$111 thousand in donations that directly benefited the AA. This level is a slight increase from the prior evaluation when GB's qualified investments and donations totaled \$1.1 million. In addition, almost all of GB's investments focused on the provision of affordable housing, a primary CD need identified in the AA. The following table details the bank's investments and donations by year and CD purpose.

<b>Qualified Investments – Ogden MSA</b>										
<b>Activity Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Prior Period	2	75	-	-	-	-	-	-	2	75
2019	-	-	-	-	-	-	-	-	-	-
2020	-	-	-	-	-	-	-	-	-	-
2021	2	3,123	-	-	-	-	-	-	2	3,123
YTD 2022	-	-	-	-	-	-	-	-	-	-
<b>Subtotal</b>	<b>4</b>	<b>3,199</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>4</b>	<b>3,199</b>
Qualified Grants & Donations	2	5	34	93	2	13	-	-	38	111
<b>Total</b>	<b>6</b>	<b>3,204</b>	<b>34</b>	<b>93</b>	<b>2</b>	<b>13</b>	<b>-</b>	<b>-</b>	<b>42</b>	<b>3,310</b>
<i>Source: Bank Data</i>										

The following are notable examples of investments and donations made in the Ogden AA.

- In 2021, GB invested in a \$2.0 million LIHTC investment that provided 40 units of affordable housing to LMI individuals and families in the AA.
- In 2021, GB funded a \$1.1 million investment in a mortgage-backed security where all the underlying mortgages are by LMI borrowers in the AA.
- From 2019 to 2022, GB provided sponsorships for students from primarily LMI schools within the AA for the Everfi financial education course totaling \$12 thousand.

### **Responsiveness to Credit and Community Development Needs**

GB exhibits excellent responsiveness to credit and CD needs. The bank demonstrated responsiveness to the Ogden AA through its focus on funding investments targeting the identified community need of affordable housing. Overall, GB funded \$3.2 million in qualified investments targeted to affordable housing needs.

### **Community Development Initiatives**

GB occasionally uses innovative and complex investments in the Ogden AA to support CD initiatives. In this AA, the bank funded a LIHTC investment totaling \$2.0 million. Refer to the bank-wide Community Development Initiatives for further details on the bank's initiatives.

### **SERVICE TEST**

Delivery systems are reasonably accessible to essentially all portions of the Ogden-Clearfield AA. Services, including business hours, do not vary in a way that inconveniences certain portions of the AA, particularly LMI geographies and/or individuals. GB provides a relatively high level of CD services in the AA. The institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems.

### **Accessibility of Delivery Systems**

Delivery systems are reasonably accessible to essentially all portions of the institution's AA. GB operates 10 branches in the AA. GB does not operate any branches in low-income CTs; however other institutions only maintain a limited presence in these geographies at 6.1 percent. In addition, the area's low-income geographies have limited population compared with the overall AA, as 1.4 percent of families and 2.0 percent of households are located in low-income geographies. Further, only 4.4 percent of the AA's businesses are located in low-income geographies. The bank maintains two branches in moderate-income geographies, which trails the branch distribution of other institutions, but exceeds the percentage of the AA's businesses that are located in moderate-income geographies and slightly trails the percentage of the households and families located in these geographies. The bank also operates six branches in middle-income geographies and two branches in upper-income geographies.

### **Changes in Branch Locations**

To the extent changes have been made, the institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the evaluation period, the bank opened two new branches in middle-income geographies through an acquisition of Altabank.

### **Reasonableness of Business Hours and Services**

Services, including business hours, do not vary in a way that inconveniences certain portions of the AA, particularly LMI geographies and/or individuals. Services and business hours are virtually the same in the Ogden-Clearfield MSA AA as those discussed in the Service Test portion for the State of Utah. Branch locations have similar hours that vary slightly according to AA needs. Each branch provides drive up service and two provide extended banking hours on weekends.

### **Community Development Services**

The bank provides a relatively high level of CD services in the Ogden AA. During the evaluation period, bank staff provided 604 hours of qualified CD services. Service hours increased from the prior evaluation, when GB employees provided 235 hours to the AA. Almost all the services provided by the bank targeted community services. The following table details the institution's CD services by year and type of service provided.

<b>Community Development Services – Ogden MSA</b>					
<b>Activity Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b># Hours</b>	<b># Hours</b>	<b># Hours</b>	<b># Hours</b>	<b># Hours</b>
2019	-	7	-	-	7
2020	-	122	-	-	122
2021	1	111	-	-	112
YTD 2022	-	363	-	-	363
<b>Total</b>	<b>1</b>	<b>603</b>	<b>-</b>	<b>-</b>	<b>604</b>
<i>Source: Bank Data</i>					

Notable examples of CD services in the Ogden AA include:

- From 2020 to 2022, a GB manager contributed 106 hours of community service assisting LMI individuals in the AA with tax preparation and financial education.
- From 2020 to 2022, a GB Vice President contributed 15 hours serving on the Board of a community services organization that provides services and safe harbor to victims of domestic violence in the AA.
- From 2019 to 2022, a GB manager contributed 20 hours serving on the Board of a local community services organization that provides food services to LMI individuals and families in the AA.

## OTHER ASSESSMENT AREAS – Limited-Scope Review

### CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED-SCOPE ASSESSMENT AREAS

The following table summarizes performance in the limited-scope AA as compared to performance in the State of Utah AA in which full-scope procedures were conducted. The conclusions are based on a review of available facts and data, aggregate lending comparisons and demographic information. The conclusions from the areas reviewed using limited-scope procedures did not impact or alter the institution's overall performance rating.

Assessment Area	Lending Test	Investment Test	Service Test
Salt Lake City-Provo-Orem	Consistent	Consistent	Exceeds

The following facts and data support the conclusions for the AA. Also included are details regarding the number and dollar volume of small business, home mortgage, small farm, and community development loans originated during the review period; qualified investments (new and prior period) and donations during the review period; and community development services for the review period. Unless otherwise noted, Branch distribution and service hours are consistent with Utah overall, and products, services, and alternative delivery systems are discussed at the institution level. Additional information is in the Limited-Scope Assessment Areas Appendices.

#### Salt Lake

GB operates 19 full-service branches in the Salt Lake AA, including 1 in a low-income CT, 2 in moderate-income CTs, 12 in middle-income CTs, and 4 in upper-income CTs. All of the bank's Salt Lake AA branches were acquired from Altabank in 2021 except one. The legacy branch is located in a middle-income geography.

Activity	#	\$
Small Business Loans	408	59,386
Home Mortgage Loans	315	136,974
Small Farm Loans	9	966
Community Development Loans	24	75,222
Investments (New)	3	12,970
Investments (Prior Period)	1	3,333
Donations	18	80
CD Services	95	-
<i>Source: Bank Data</i>		

## **APPENDICES**

### **LARGE BANK PERFORMANCE CRITERIA**

#### **Lending Test**

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) through its lending activities by considering a bank's home mortgage, small business, small farm, and community development lending. If consumer lending constitutes a substantial majority of a bank's business, the FDIC will evaluate the bank's consumer lending in one or more of the following categories: motor vehicle, credit card, other secured, and other unsecured. The bank's lending performance is evaluated pursuant to the following criteria:

- 1) The number and amount of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, in the bank's assessment area;
- 2) The geographic distribution of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, based on the loan location, including:
  - i. The proportion of the bank's lending in the bank's assessment area(s);
  - ii. The dispersion of lending in the bank's assessment areas(s); and
  - iii. The number and amount of loans in low-, moderate-, middle- and upper-income geographies in the bank's assessment area(s);
- 3) The distribution, particularly in the bank's assessment area(s), of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, based on borrower characteristics, including the number and amount of:
  - i. Home mortgage loans low-, moderate-, middle- and upper-income individuals
  - ii. Small business and small farm loans to businesses and farms with gross annual revenues of \$1 million or less;
  - iii. Small business and small farm loans by loan amount at origination; and
  - iv. Consumer loans, if applicable, to low-, moderate-, middle- and upper-income individuals;
- 4) The bank's community development lending, including the number and amount of community development loans, and their complexity and innovativeness; and
- 5) The bank's use of innovative or flexible lending practices in a safe and sound manner to address the credit needs of low- and moderate-income individuals or geographies.

#### **Investment Test**

The Investment Test evaluates the institution's record of helping to meet the credit needs of its assessment area(s) through qualified investments that benefit its assessment area(s) or a broader statewide or regional area that includes the bank's assessment area(s). Activities considered under the Lending or Service Test may not be considered under the investment test. The bank's investment performance is evaluated pursuant to the following criteria:

- 1) The dollar amount of qualified investments;
- 2) The innovativeness or complexity of qualified investments;
- 3) The responsiveness of qualified investments to available opportunities; and
- 4) The degree to which qualified investments are not routinely provided by private investors.

## **Service Test**

The Service Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by analyzing both the availability and effectiveness of the bank's systems for delivering retail banking services and the extent and innovativeness of its community development services.

The bank's retail banking services are evaluated pursuant to the following criteria:

- 1) The current distribution of the bank's branches among low-, moderate-, middle-, and upper-income geographies;
- 2) In the context of its current distribution of the bank's branches, the bank's record of opening and closing branches, particularly branches located in low- or moderate-income geographies or primarily serving low- or moderate-income individuals;
- 3) The availability and effectiveness of alternative systems for delivering retail banking services (*e.g.*, RSFs, RSFs not owned or operated by or exclusively for the bank, banking by telephone or computer, loan production offices, and bank-at-work or bank-by-mail programs) in low- and moderate-income geographies and to low- and moderate-income individuals; and
- 4) The range of services provided in low-, moderate-, middle-, and upper-income geographies and the degree to which the services are tailored to meet the needs of those geographies.

The bank's community development services are evaluated pursuant to the following criteria:

- 1) The extent to which the bank provides community development services; and
- 2) The innovativeness and responsiveness of community development services.

## SCOPE OF EVALUATION

<b>Glacier Bank</b>	
<b>Scope of Examination:</b> Full scope reviews were performed on the following assessment areas within the noted rated areas: State of Montana: Montana Non-MSA Assessment Area State of Idaho: Coeur d'Alene Assessment Area State of Wyoming: Wyoming Non-MSA Assessment Area State of Colorado: Colorado Non-MSA Assessment Area State of Arizona: Prescott MSA Assessment Area State of Washington: Spokane MSA Assessment Area State of Nevada State of Utah: Ogden-Clearfield MSA Assessment Area	
<b>Time Period Reviewed:</b>	5/13/2019 to 7/18/2022
<b>Products Reviewed:</b> Home Mortgage: 1/1/2019 – 12/31/2021 Small Business: 1/1/2019 – 12/31/2021 Small Farm 1/1/2019 – 12/31/2021	

## SUMMARY OF RATINGS FOR RATED AREAS

<b>Rated Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>	<b>Rating</b>
Montana	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Idaho	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Wyoming	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Colorado	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Arizona	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Washington	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
Nevada	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Utah	High Satisfactory	Outstanding	High Satisfactory	Satisfactory

## GEOGRAPHIC DISTRIBUTION AND BORROWER PROFILE TABLES

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
<b>MONTANA</b>																			
MT Non-MSA	2,686	609,578	24.2	18,871	1.1	0.6	0.5	17.8	12.0	11.8	55.5	58.3	53.3	25.7	29.1	34.3	0.0	0.0	0.0
Billings	499	91,174	4.5	6,982	1.1	1.4	0.9	17.4	13.0	13.0	62.6	68.3	65.6	19.0	17.2	20.5	0.0	0.0	0.0
Great Falls	11	1,125	0.1	3,166	0.0	0.0	0.0	12.0	9.1	13.7	56.5	81.8	52.4	31.5	9.1	33.9	0.0	0.0	0.0
Missoula	505	96,744	4.5	4,460	0.5	0.4	0.8	12.6	17.0	14.5	67.3	60.4	65.2	19.6	22.2	19.6	0.0	0.0	0.0
<b>IDAHO</b>																			
Coeur d'Alene	951	240,041	8.6	11,525	0.0	0.0	0.0	12.8	14.5	14.6	72.0	68.5	72.2	15.3	17.0	13.2	0.0	0.0	0.0
Boise City	349	66,452	3.1	46,162	1.5	2.3	1.6	22.2	16.9	19.4	46.4	47.6	47.1	29.9	33.2	31.8	0.0	0.0	0.0
Idaho Falls Rexburg Blackfoot	189	47,028	1.7	10,870	2.6	3.2	2.9	8.2	6.9	8.4	66.3	58.7	62.3	22.9	31.2	26.5	0.0	0.0	0.0
Pocatello	367	65,047	3.3	3,964	1.6	1.6	2.8	14.7	12.8	14.1	53.5	50.4	48.3	30.1	35.2	34.9	0.0	0.0	0.0
ID Non-MSA	541	123,556	4.9	5,064	0.0	0.0	0.0	4.3	1.5	3.8	65.8	88.5	62.8	29.9	10.0	33.4	0.0	0.0	0.0
<b>WYOMING</b>																			
WY Non-MSA	562	96,394	5.1	4,948	0.0	0.0	0.0	17.9	28.6	16.9	66.3	64.2	65.6	15.8	7.1	17.5	0.0	0.0	0.0
<b>COLORADO</b>																			
CO Non-MSA	161	32,341	1.4	6,875	0.0	0.0	0.0	2.4	2.5	1.4	48.4	53.4	44.2	49.2	44.1	54.4	0.0	0.0	0.0
Colorado Springs	34	8,635	0.3	50,869	3.3	8.8	2.5	20.7	17.6	18.2	42.2	32.4	44.9	33.8	41.2	34.4	0.0	0.0	0.0
Denver-Aurora	101	51,559	0.9	195,754	4.8	15.8	4.6	19.4	21.8	18.9	33.7	20.8	33.5	42.1	41.6	42.9	0.0	0.0	0.0
Grand Junction	30	5,652	0.3	10,098	0.0	0.0	0.0	19.1	13.3	18.9	58.3	73.3	61.3	22.7	13.3	19.8	0.0	0.0	0.0



Pueblo-Canon City	52	10,179	0.5	10,021	2.7	3.8	1.8	29.4	32.7	27.4	35.1	28.8	29.8	32.8	34.6	41.0	0.0	0.0	0.1
<b>ARIZONA</b>																			
Prescott	20	4,328	0.2	13,395	0.0	0.0	0.0	18.7	20.0	15.9	61.2	55.0	65.5	20.1	25.0	18.6	0.0	0.0	0.0
Flagstaff	8	3,547	0.1	5,700	3.5	0.0	0.0	18.2	12.5	11.7	35.6	12.5	36.7	42.7	75.0	51.4	0.0	0.0	0.2
Phoenix	6	10,856	0.1	29,530	3.6	16.7	0.9	27.1	33.3	14.8	60.5	33.3	78.2	8.8	16.7	6.0	0.0	0.0	0.0
Tucson	3	2,693	0.0	47,472	4.7	33.3	3.3	21.4	0.0	15.2	32.9	33.3	31.3	41.0	33.3	50.3	0.0	0.0	0.0
Yuma	35	7,219	0.3	7,010	0.0	0.0	0.0	25.7	31.4	16.7	47.0	45.7	41.1	27.3	22.9	42.1	0.0	0.0	0.0
<b>WASHINGTON</b>																			
Spokane	383	113,568	3.4	26,303	0.1	0.0	0.1	17.8	15.7	21.5	46.9	37.3	42.8	34.9	46.7	35.3	0.4	0.3	0.4
Wenatchee	101	33,724	0.9	5,022	0.0	0.0	0.0	12.3	11.9	13.5	78.4	74.3	78.0	9.3	13.9	8.5	0.0	0.0	0.0
WA Non-MSA	51	9,351	0.5	4,554	1.1	0.0	1.7	15.0	7.8	10.3	76.7	92.2	80.2	7.2	0.0	7.9	0.0	0.0	0.0
<b>UTAH</b>																			
Ogden-Clearfield	37	7,551	0.3	4,115	0.0	0.0	0.0	30.0	13.5	29.9	47.7	24.3	45.5	22.3	62.2	24.6	0.0	0.0	0.0
Salt Lake City-Provo-Orem	41	13,413	0.4	3,372	0.0	0.0	0.0	0.0	0.0	0.0	30.7	31.7	26.4	68.9	68.3	72.1	0.5	0.0	1.5
Source: 2015 ACS Census; 01/01/2019 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
<b>MONTANA</b>																			
MT Non-MSA	3,553	967,719	21.8	29,371	1.1	0.5	0.3	17.8	10.8	11.1	55.5	57.7	52.2	25.7	31.0	36.4	0.0	0.0	0.0
Billings	695	138,208	4.3	11,239	1.1	0.7	0.8	17.4	11.9	11.7	62.6	66.6	64.7	19.0	20.7	22.7	0.0	0.0	0.0
Great Falls	30	6,160	0.2	4,459	0.0	0.0	0.0	12.0	6.7	13.4	56.5	66.7	49.1	31.5	26.7	37.5	0.0	0.0	0.0
Missoula	784	192,316	4.8	7,562	0.5	0.8	0.4	12.6	12.0	13.4	67.3	63.5	64.1	19.6	23.7	22.0	0.0	0.0	0.0

<b>IDAHO</b>																			
Coeur d'Alene	1,346	360,382	8.2	17,221	0.0	0.0	0.0	12.8	13.8	14.2	72.0	69.9	72.5	15.3	16.3	13.3	0.0	0.0	0.0
Boise City	450	92,718	2.8	66,291	1.5	1.8	1.3	22.2	14.9	17.5	46.4	51.3	47.4	29.9	32.0	33.7	0.0	0.0	0.0
Idaho Falls Rexburg Blackfoot	311	76,413	1.9	17,186	2.6	1.0	2.7	8.2	5.5	8.2	66.3	59.5	63.1	22.9	34.1	26.1	0.0	0.0	0.0
Pocatello	470	95,283	2.9	5,631	1.6	2.3	2.6	14.7	9.4	12.1	53.5	46.8	47.4	30.1	41.5	38.0	0.0	0.0	0.0
ID Non-MSA	669	165,640	4.1	7,330	0.0	0.0	0.0	4.3	1.8	3.1	65.8	90.3	61.0	29.9	7.9	35.9	0.0	0.0	0.0
<b>WYOMING</b>																			
WY Non-MSA	983	205,652	6.0	8,081	0.0	0.0	0.0	17.9	25.2	16.7	66.3	66.9	66.3	15.8	7.8	17.0	0.0	0.0	0.0
Casper	109	24,303	0.7	4,994	4.0	10.1	2.3	10.2	9.2	9.9	68.1	58.7	72.1	17.7	22.0	15.6	0.0	0.0	0.0
<b>COLORADO</b>																			
CO Non-MSA	185	43,148	1.1	10,932	0.0	0.0	0.0	2.4	1.1	1.2	48.4	52.4	43.1	49.2	46.5	55.7	0.0	0.0	0.0
Colorado Springs	48	12,231	0.3	76,478	3.3	2.1	2.1	20.7	27.1	16.1	42.2	27.1	42.9	33.8	43.8	38.9	0.0	0.0	0.0
Denver Aurora Lakewood	92	49,209	0.6	288,499	4.8	4.3	4.1	19.4	19.6	16.9	33.7	17.4	32.3	42.1	55.4	46.6	0.0	3.3	0.0
Grand Junction	72	13,354	0.4	14,276	0.0	0.0	0.0	19.1	20.8	16.2	58.3	56.9	61.3	22.7	22.2	22.5	0.0	0.0	0.0
Pueblo Canon City	73	12,463	0.4	13,258	2.7	1.4	1.6	29.4	32.9	25.1	35.1	24.7	29.4	32.8	41.1	43.9	0.0	0.0	0.0
<b>ARIZONA</b>																			
Prescott	290	82,108	1.8	19,745	0.0	0.0	0.0	18.7	14.1	15.3	61.2	60.0	65.3	20.1	25.9	19.4	0.0	0.0	0.0
Flagstaff	22	5,846	0.1	9,946	3.5	0.0	0.0	18.2	0.0	11.0	35.6	31.8	34.3	42.7	68.2	54.6	0.0	0.0	0.1
Lake Havasu	297	80,711	1.8	16,110	0.0	0.0	0.0	9.2	1.7	3.0	72.3	69.7	70.9	18.5	28.6	26.1	0.0	0.0	0.0
Phoenix	108	57,948	0.7	436,923	4.5	7.4	2.7	19.6	15.7	13.1	37.1	32.4	38.4	38.7	44.4	45.2	0.0	0.0	0.6
Tucson	12	4,778	0.1	74,096	4.7	0.0	2.8	21.4	8.3	13.6	32.9	25.0	30.3	41.0	66.7	53.2	0.0	0.0	0.0
Yuma	28	7,312	0.2	10,426	0.0	0.0	0.0	25.7	21.4	15.6	47.0	42.9	39.4	27.3	35.7	45.0	0.0	0.0	0.0
<b>WASHINGTON</b>																			
Spokane	560	162,301	3.4	38,265	0.1	0.0	0.1	17.8	9.3	18.8	46.9	37.5	42.2	34.9	52.7	38.5	0.4	0.5	0.5
Wenatchee	138	52,450	0.8	7,998	0.0	0.0	0.0	12.3	11.6	12.2	78.4	73.9	78.2	9.3	14.5	9.6	0.0	0.0	0.0
WA Non-MSA	74	15,870	0.5	6,878	1.1	0.0	1.3	15.0	4.1	10.2	76.7	93.2	80.4	7.2	2.7	8.1	0.0	0.0	0.0

<b>UTAH</b>																			
Ogden-Clearfield	126	41,456	0.8	73,281	0.9	2.4	1.0	17.5	7.9	15.1	48.0	31.0	47.6	33.5	58.7	36.2	0.0	0.0	0.0
Salt Lake City-Provo-Orem	54	20,432	0.3	112,621	1.4	0.0	1.1	16.8	9.3	13.1	44.3	48.1	43.5	37.0	42.6	41.8	0.5	0.0	0.5
<b>NEVADA</b>																			
Reno-Carson City	84	24,660	0.5	45,196	2.1	2.4	1.4	13.0	8.3	8.8	43.2	32.1	42.5	41.5	57.1	47.2	0.3	0.0	0.2
Source: 2015 ACS Census; 01/01/2020 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
<b>MONTANA</b>																			
MT Non-MSA	3,116	957,839	22.4	--	1.0	0.8	--	17.5	12.6	--	56.0	57.9	--	25.4	28.8	--	0.0	0.0	--
Billings	637	135,558	4.6	--	1.1	1.3	--	17.4	17.7	--	62.6	61.9	--	19.0	19.2	--	0.0	0.0	--
Great Falls	24	20,882	0.2	--	0.0	0.0	--	12.0	25.0	--	56.5	41.7	--	31.5	33.3	--	0.0	0.0	--
Missoula	586	198,433	4.2	--	0.5	0.2	--	12.6	11.9	--	67.3	65.2	--	19.6	22.7	--	0.0	0.0	--
<b>IDAHO</b>																			
Coeur d'Alene	1,047	379,796	7.5	--	0.0	0.0	--	12.8	14.3	--	72.0	69.5	--	15.3	16.1	--	0.0	0.0	--
Boise City	346	81,039	2.5	--	1.5	2.3	--	22.2	19.9	--	46.4	45.7	--	29.9	32.1	--	0.0	0.0	--
Idaho Falls Rexburg Blackfoot	241	66,653	1.7	--	2.6	3.7	--	8.2	4.1	--	66.3	54.4	--	22.9	37.8	--	0.0	0.0	--
Pocatello	357	86,261	2.6	--	1.6	2.2	--	14.7	11.5	--	53.5	48.7	--	30.1	37.5	--	0.0	0.0	--
ID Non-MSA	556	175,224	4.0	--	0.0	0.0	--	4.3	2.9	--	65.8	86.7	--	29.9	10.4	--	0.0	0.0	--

<b>WYOMING</b>																			
WY Non-MSA	783	185,173	5.6	--	0.0	0.0	--	15.0	29.1	--	71.8	61.7	--	13.2	9.2	--	0.0	0.0	--
Casper	146	48,165	1.0	--	4.0	6.8	--	10.2	10.3	--	68.1	70.5	--	17.7	12.3	--	0.0	0.0	--
<b>COLORADO</b>																			
CO Non-MSA	163	47,984	1.2	--	0.0	0.0	--	2.4	3.7	--	48.4	38.7	--	49.2	57.7	--	0.0	0.0	--
Colorado Springs	56	21,743	0.4	--	3.3	3.6	--	20.7	42.9	--	42.2	32.1	--	33.8	21.4	--	0.0	0.0	--
Denver Aurora Lakewood	97	60,587	0.7	--	4.8	21.6	--	19.4	18.6	--	33.7	23.7	--	42.1	36.1	--	0.0	0.0	--
Grand Junction	50	11,314	0.4	--	0.0	0.0	--	19.1	16.0	--	58.3	58.0	--	22.7	26.0	--	0.0	0.0	--
Pueblo Canon City	72	12,212	0.5	--	2.7	4.2	--	29.4	33.3	--	35.1	26.4	--	32.8	36.1	--	0.0	0.0	--
<b>ARIZONA</b>																			
Prescott	216	70,970	1.6	--	0.0	0.0	--	18.7	15.3	--	61.2	53.2	--	20.1	31.5	--	0.0	0.0	--
Flagstaff	30	17,250	0.2	--	3.5	0.0	--	18.2	20.0	--	35.6	26.7	--	42.7	53.3	--	0.0	0.0	--
Lake Havasu	219	67,851	1.6	--	0.0	0.0	--	9.2	0.9	--	72.3	71.2	--	18.5	27.9	--	0.0	0.0	--
Phoenix	77	54,328	0.6	--	4.5	5.2	--	19.6	15.6	--	37.1	35.1	--	38.7	44.2	--	0.0	0.0	--
Tucson	11	4,053	0.1	--	4.7	9.1	--	21.4	18.2	--	32.9	18.2	--	41.0	54.5	--	0.0	0.0	--
Yuma	37	19,742	0.3	--	0.0	0.0	--	25.7	27.0	--	47.0	29.7	--	27.3	43.2	--	0.0	0.0	--
<b>WASHINGTON</b>																			
Spokane	414	128,165	3.0	--	0.1	0.0	--	17.8	16.9	--	46.9	37.9	--	34.9	44.9	--	0.4	0.2	--
Wenatchee	103	34,132	0.7	--	0.0	0.0	--	12.3	6.8	--	78.4	82.5	--	9.3	10.7	--	0.0	0.0	--
WA Non-MSA	81	18,312	0.6	--	1.1	0.0	--	15.0	12.3	--	76.7	86.4	--	7.2	1.2	--	0.0	0.0	--
<b>UTAH</b>																			
Ogden-Clearfield	154	57,413	1.1	--	0.9	1.9	--	17.5	19.5	--	48.0	39.6	--	33.5	39.0	--	0.0	0.0	--
Salt Lake City- Provo-Orem	220	103,129	1.6	--	1.4	1.8	--	16.8	10.9	--	44.3	45.5	--	37.0	40.9	--	0.5	0.9	--
<b>NEVADA</b>																			
Reno-Carson City	110	49,772	0.8	--	2.1	3.6	--	13.0	6.4	--	43.2	37.3	--	41.5	52.7	--	0.3	0.0	--

Source: 2015 ACS Census; 01/01/2021 - 12/31/2021 Bank Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
<b>MONTANA</b>																			
MT Non-MSA	1,845	224,553	36.6	15,031	2.0	0.8	1.4	15.9	15.9	14.7	54.0	54.7	53.0	28.1	28.6	30.9	0.0	0.0	0.0
Billings	266	35,151	5.3	4,570	2.1	2.3	1.9	27.7	28.6	25.7	54.9	58.6	56.8	15.3	10.5	15.6	0.0	0.0	0.0
Great Falls	32	2,992	0.6	1,600	0.0	0.0	0.0	25.7	15.6	24.1	49.5	78.1	52.8	24.7	6.3	23.2	0.0	0.0	0.0
Missoula	642	83,767	12.7	3,565	9.9	14.2	11.5	18.4	26.0	20.4	57.1	50.9	56.1	14.5	8.9	12.0	0.0	0.0	0.0
<b>IDAHO</b>																			
Coeur d'Alene	175	36,427	3.5	3,969	0.0	0.0	0.0	21.0	21.7	17.7	65.8	73.1	70.1	13.2	5.1	12.1	0.0	0.0	0.0
Boise City	237	39,160	4.7	15,184	9.8	19.0	9.4	23.0	17.3	22.0	37.4	38.8	37.3	29.9	24.9	31.3	0.0	0.0	0.0
Idaho Falls Rexburg Blackfoot	123	27,104	2.4	5,262	6.2	8.9	5.9	13.9	17.1	11.1	55.1	42.3	58.6	24.8	31.7	24.4	0.0	0.0	0.0
Pocatello	86	15,111	1.7	1,351	4.2	3.5	4.1	22.9	27.9	23.8	50.7	46.5	47.4	22.3	22.1	24.7	0.0	0.0	0.0
ID Non-MSA	160	17,135	3.2	2,772	0.0	0.0	0.0	3.0	1.3	1.9	65.3	65.0	57.5	31.7	33.8	40.5	0.0	0.0	0.0
<b>WYOMING</b>																			
WY Non-MSA	463	41,926	9.2	2,948	0.0	0.0	0.0	21.2	35.0	21.2	65.4	55.3	65.2	13.4	9.7	13.6	0.0	0.0	0.0
<b>COLORADO</b>																			
CO Non-MSA	225	29,305	4.5	4,329	0.0	0.0	0.0	3.3	3.1	2.9	49.4	62.2	50.0	47.3	34.7	47.1	0.0	0.0	0.0
Colorado Springs	47	13,719	0.9	15,387	7.2	14.9	7.2	23.2	48.9	23.0	33.0	19.1	32.4	36.4	17.0	37.3	0.2	0.0	0.0
Denver Aurora Lakewood	110	41,265	2.2	84,630	6.8	8.2	8.1	18.7	19.1	19.3	31.3	24.5	29.9	42.9	47.3	42.4	0.3	0.9	0.4
Grand Junction	90	19,980	1.8	3,820	0.0	0.0	0.0	17.6	13.3	17.3	56.7	66.7	55.9	25.7	20.0	26.8	0.0	0.0	0.0
Pueblo Canon City	98	16,990	1.9	3,066	2.4	3.1	2.3	32.8	27.6	28.7	32.8	40.8	33.2	31.6	28.6	35.9	0.4	0.0	0.0
<b>ARIZONA</b>																			
Prescott	67	16,502	1.3	5,766	0.0	0.0	0.0	22.3	31.3	22.1	51.3	47.8	52.3	26.4	20.9	25.6	0.0	0.0	0.0

Flagstaff	30	6,773	0.6	2,808	0.3	0.0	0.1	19.5	23.3	22.1	30.8	36.7	29.9	47.7	40.0	47.2	1.8	0.0	0.7
Phoenix	12	2,195	0.2	4,538	3.5	33.3	3.3	24.7	16.7	28.3	62.5	50.0	58.8	9.4	0.0	9.6	0.0	0.0	0.0
Tucson	4	1,610	0.1	18,774	6.3	0.0	6.4	23.3	25.0	24.3	29.6	0.0	28.5	39.8	75.0	39.8	1.0	0.0	0.9
Yuma	88	22,199	1.7	2,326	0.0	0.0	0.0	28.1	37.5	31.2	39.1	27.3	39.0	32.8	35.2	29.9	0.0	0.0	0.0
<b>WASHINGTON</b>																			
Spokane	78	18,952	1.5	8,506	3.2	3.8	2.7	30.9	42.3	28.3	39.0	37.2	39.5	26.1	15.4	28.9	0.9	1.3	0.7
Wenatchee	59	9,456	1.2	2,273	0.0	0.0	0.0	20.2	20.3	17.7	71.1	74.6	73.9	8.8	5.1	8.4	0.0	0.0	0.0
WA Non-MSA	31	4,623	0.6	1,913	1.9	0.0	1.3	14.4	6.5	13.8	78.8	93.5	78.0	4.9	0.0	6.9	0.0	0.0	0.0
<b>UTAH</b>																			
Ogden-Clearfield	9	720	0.2	1,127	0.0	0.0	0.0	27.3	11.1	25.2	43.0	22.2	45.3	29.6	66.7	29.5	0.0	0.0	0.0
Salt Lake City-Provo-Orem	15	5,093	0.3	2,299	0.0	0.0	0.0	0.0	0.0	0.0	18.3	26.7	21.7	81.6	73.3	78.1	0.1	0.0	0.2
Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; 2019 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
<b>MONTANA</b>																			
MT Non-MSA	5,750	446,438	29.3	16,319	1.9	1.0	1.3	15.3	14.4	13.7	53.2	55.1	52.9	29.7	29.5	32.2	0.0	0.0	0.0
Billings	817	74,385	4.2	4,983	2.1	2.6	1.8	27.0	32.4	27.7	55.2	55.6	56.4	15.7	9.4	14.1	0.0	0.0	0.0
Great Falls	104	9,384	0.5	1,852	0.0	0.0	0.0	25.5	8.7	25.1	49.2	81.7	49.7	25.4	9.6	25.2	0.0	0.0	0.0
Missoula	1,655	181,414	8.4	4,123	10.0	14.8	12.4	18.6	25.3	21.9	56.2	50.3	54.1	15.3	9.6	11.5	0.0	0.0	0.0
<b>IDAHO</b>																			
Coeur d'Alene	897	88,152	4.6	4,337	0.0	0.0	0.0	21.3	23.7	20.3	65.0	67.8	69.0	13.7	8.5	10.7	0.0	0.0	0.0
Boise City	891	87,612	4.5	15,868	9.3	14.8	11.0	22.0	23.6	22.7	38.3	34.1	35.9	30.4	27.5	30.4	0.0	0.0	0.0

Idaho Falls Rexburg Blackfoot	391	50,782	2.0	6,594	5.7	12.0	6.3	13.2	12.5	12.0	54.9	47.1	56.6	26.2	28.4	25.0	0.0	0.0	0.0
Pocatello	335	32,339	1.7	1,601	4.0	2.4	3.9	20.9	29.9	22.9	49.9	46.9	52.3	25.2	20.9	20.8	0.0	0.0	0.0
ID Non-MSA	834	46,713	4.2	3,746	0.0	0.0	0.0	3.0	1.9	2.2	66.8	66.2	52.8	30.3	31.9	45.0	0.0	0.0	0.0
<b>WYOMING</b>																			
WY Non-MSA	1,406	98,954	7.2	3,388	0.0	0.0	0.0	21.2	24.3	21.0	65.7	59.3	63.8	13.2	16.4	15.2	0.0	0.0	0.0
Casper	228	48,946	1.2	2,324	18.7	19.3	16.7	9.7	15.8	12.3	53.8	37.3	47.2	17.9	27.6	23.8	0.0	0.0	0.0
<b>COLORADO</b>																			
CO Non-MSA	649	50,034	3.3	5,487	0.0	0.0	0.0	3.3	2.8	1.9	48.8	62.7	47.7	47.9	34.5	50.4	0.0	0.0	0.0
Colorado Springs	180	24,803	0.9	15,365	7.1	10.0	8.6	23.2	39.4	24.2	33.5	28.3	29.9	36.1	22.2	37.3	0.2	0.0	0.0
Denver Aurora Lakewood	584	97,622	3.0	94,142	7.0	8.9	8.0	19.0	19.9	19.0	31.2	30.1	30.1	42.4	40.8	42.5	0.3	0.3	0.4
Grand Junction	274	36,253	1.4	4,299	0.0	0.0	0.0	17.7	20.1	17.8	56.3	59.5	57.2	26.0	20.4	24.9	0.0	0.0	0.0
Pueblo Canon City	417	43,526	2.1	3,085	2.3	1.9	2.0	32.3	35.0	30.6	33.1	32.9	32.7	32.0	30.2	34.6	0.4	0.0	0.0
<b>ARIZONA</b>																			
Prescott	516	55,560	2.6	6,100	0.0	0.0	0.0	21.4	32.8	24.6	51.5	43.2	50.0	27.1	24.0	25.4	0.0	0.0	0.0
Flagstaff	214	21,650	1.1	3,573	0.1	0.0	0.2	18.2	31.8	23.2	32.4	21.0	31.0	48.0	46.3	44.8	1.5	0.9	0.8
Lake Havasu	302	30,643	1.5	3,698	0.0	0.0	0.0	4.3	2.0	4.1	71.9	73.8	74.4	23.8	24.2	21.6	0.0	0.0	0.0
Phoenix	153	25,189	0.8	123,870	7.1	9.2	6.6	15.3	34.0	17.0	31.2	20.3	27.8	45.8	35.3	47.9	0.5	1.3	0.6
Tucson	59	6,919	0.3	19,825	6.0	6.8	7.4	22.2	22.0	25.3	28.7	22.0	28.9	42.0	47.5	37.3	1.1	1.7	1.0
Yuma	313	45,536	1.6	2,528	0.0	0.0	0.0	28.7	33.5	30.9	38.4	31.6	38.3	32.9	34.8	30.9	0.0	0.0	0.0
<b>WASHINGTON</b>																			
Spokane	358	46,954	1.8	9,503	2.9	2.5	2.9	33.9	34.9	30.5	35.9	42.7	39.9	26.3	19.6	25.8	0.9	0.3	0.9
Wenatchee	272	27,912	1.4	3,065	0.0	0.0	0.0	19.5	21.0	20.4	70.8	75.4	72.7	9.7	3.7	6.9	0.0	0.0	0.0
WA Non-MSA	303	19,404	1.5	2,538	1.6	0.0	0.9	14.3	10.2	12.2	78.8	89.8	81.0	5.4	0.0	5.9	0.0	0.0	0.0
<b>UTAH</b>																			
Ogden-Clearfield	372	36,745	1.9	12,056	4.4	2.2	5.6	16.7	21.2	15.6	42.2	37.4	43.4	36.6	39.2	35.3	0.0	0.0	0.0
Salt Lake City- Provo-Orem	251	35,805	1.3	31,586	2.6	2.4	2.8	19.6	17.9	21.1	37.8	29.1	37.3	39.2	49.8	38.0	0.8	0.8	0.8

<b>NEVADA</b>																			
Reno-Carson City	1,045	133,107	5.3	16,446	6.8	9.7	6.8	22.5	29.8	22.2	29.4	26.1	28.0	37.2	27.9	39.3	4.1	6.5	3.7
Source: 2020 D&B Data; 01/01/2020 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2021
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
<b>MONTANA</b>																			
MT Non-MSA	3,629	308,270	30.2	--	1.7	0.8	--	14.6	14.4	--	53.9	57.6	--	29.9	27.2	--	0.0	0.0	--
Billings	525	64,756	4.4	--	2.0	2.5	--	25.9	29.5	--	56.2	56.2	--	15.9	11.8	--	0.0	0.0	--
Great Falls	90	9,159	0.7	--	0.0	0.0	--	25.1	8.9	--	49.0	78.9	--	25.9	12.2	--	0.0	0.0	--
Missoula	1,077	114,771	8.9	--	9.8	14.0	--	18.2	20.7	--	55.8	55.6	--	16.3	9.7	--	0.0	0.0	--
<b>IDAHO</b>																			
Coeur d'Alene	406	50,907	3.4	--	0.0	0.0	--	20.7	20.7	--	65.8	71.2	--	13.5	8.1	--	0.0	0.0	--
Boise City	446	45,561	3.7	--	8.2	18.2	--	21.5	21.7	--	39.5	33.2	--	30.8	26.9	--	0.0	0.0	--
Idaho Falls Rexburg Blackfoot	202	37,686	1.7	--	6.2	10.9	--	12.5	8.4	--	55.5	49.0	--	25.8	31.7	--	0.0	0.0	--
Pocatello	184	22,012	1.5	--	3.8	4.3	--	20.6	28.8	--	48.8	41.3	--	26.8	25.5	--	0.0	0.0	--
ID Non-MSA	414	30,940	3.4	--	0.0	0.0	--	2.9	1.7	--	67.6	66.4	--	29.6	31.9	--	0.0	0.0	--
<b>WYOMING</b>																			
WY Non-MSA	957	78,336	8.0	--	0.0	0.0	--	12.5	24.2	--	79.8	62.7	--	7.7	13.1	--	0.0	0.0	--
Casper	290	39,792	2.4	--	18.3	17.9	--	8.3	12.1	--	48.9	49.7	--	24.5	20.3	--	0.0	0.0	--
<b>COLORADO</b>																			
CO Non-MSA	442	42,631	3.7	--	0.0	0.0	--	3.4	2.9	--	48.2	59.1	--	48.4	38.0	--	0.0	0.0	--



Colorado Springs	87	15,422	0.7	--	6.9	10.3	--	23.2	34.5	--	34.1	33.3	--	35.7	21.8	--	0.1	0.0	--
Denver Aurora Lakewood	375	78,495	3.1	--	7.0	8.8	--	19.5	19.2	--	31.3	31.5	--	41.9	39.7	--	0.3	0.8	--
Grand Junction	189	30,564	1.6	--	0.0	0.0	--	17.5	14.8	--	56.2	59.8	--	26.3	25.4	--	0.0	0.0	--
Pueblo Canon City	273	36,996	2.3	--	2.4	0.7	--	32.3	35.9	--	32.4	31.5	--	32.5	31.9	--	0.3	0.0	--
<b>ARIZONA</b>																			
Prescott	297	48,463	2.5	--	0.0	0.0	--	21.2	36.4	--	51.5	39.7	--	27.3	23.9	--	0.0	0.0	--
Flagstaff	139	14,548	1.2	--	0.1	0.0	--	17.7	37.4	--	32.3	23.0	--	48.6	39.6	--	1.4	0.0	--
Lake Havasu	138	17,251	1.1	--	0.0	0.0	--	4.1	0.7	--	71.6	81.2	--	24.3	18.1	--	0.0	0.0	--
Phoenix	109	21,089	0.9	--	6.9	6.4	--	15.5	36.7	--	30.9	24.8	--	46.2	30.3	--	0.5	1.8	--
Tucson	40	7,216	0.3	--	6.0	12.5	--	22.1	20.0	--	28.5	35.0	--	42.4	32.5	--	1.0	0.0	--
Yuma	195	30,111	1.6	--	0.0	0.0	--	27.8	37.4	--	38.7	30.3	--	33.5	32.3	--	0.0	0.0	--
<b>WASHINGTON</b>																			
Spokane	222	39,061	1.8	--	3.0	1.4	--	33.9	37.4	--	35.8	43.7	--	26.4	17.6	--	0.9	0.0	--
Wenatchee	197	24,735	1.6	--	0.0	0.0	--	19.7	17.8	--	70.5	77.7	--	9.9	4.6	--	0.0	0.0	--
WA Non-MSA	195	10,119	1.6	--	1.6	0.0	--	14.5	7.2	--	78.5	92.8	--	5.4	0.0	--	0.0	0.0	--
<b>UTAH</b>																			
Ogden-Clearfield	187	25,188	1.6	--	4.3	1.1	--	16.5	17.6	--	42.1	41.2	--	37.1	40.1	--	0.0	0.0	--
Salt Lake City-Provo-Orem	142	18,488	1.2	--	2.6	4.2	--	19.4	20.4	--	37.5	30.3	--	39.7	44.4	--	0.8	0.7	--
<b>NEVADA</b>																			
Reno-Carson City	587	88,632	4.9	--	6.9	9.4	--	22.2	27.4	--	29.3	25.9	--	37.5	30.3	--	4.1	7.0	--
Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%																			

Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2019
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
<b>MONTANA</b>																			
MT Non-MSA	758	86,166	27.1	1,935	0.4	0.0	0.2	21.0	19.7	18.3	60.6	77.6	74.5	18.0	2.8	7.0	0.0	0.0	0.0
Billings	31	2,248	1.1	497	1.0	0.0	0.0	13.9	19.4	11.3	67.3	74.2	74.8	17.8	6.5	13.9	0.0	0.0	0.0
Great Falls	45	5,368	1.6	209	0.0	0.0	0.0	8.7	0.0	1.4	75.9	97.8	89.5	15.4	2.2	9.1	0.0	0.0	0.0
Missoula	9	606	0.3	45	2.9	0.0	2.2	14.3	0.0	0.0	69.3	100.0	93.3	13.5	0.0	4.4	0.0	0.0	0.0
<b>IDAHO</b>																			
Coeur d'Alene	2	156	0.1	53	0.0	0.0	0.0	13.8	100.0	18.9	70.1	0.0	71.7	16.1	0.0	9.4	0.0	0.0	0.0
Boise City	4	647	0.1	404	4.3	0.0	0.5	22.9	25.0	24.8	46.9	75.0	48.5	26.0	0.0	26.2	0.0	0.0	0.0
Idaho Falls Rexburg Blackfoot	10	1,184	0.4	831	2.7	0.0	0.1	4.3	10.0	0.6	73.1	50.0	79.2	19.9	40.0	20.1	0.0	0.0	0.0
Pocatello	7	393	0.3	89	0.6	0.0	2.2	9.1	0.0	1.1	73.8	71.4	87.6	16.6	28.6	9.0	0.0	0.0	0.0
ID Non-MSA	5	1,307	0.2	168	0.0	0.0	0.0	2.3	0.0	2.4	73.2	100.0	70.8	24.6	0.0	26.8	0.0	0.0	0.0
<b>WYOMING</b>																			
WY Non-MSA	479	43,079	17.1	651	0.0	0.0	0.0	27.0	46.8	40.4	66.3	51.1	56.1	6.6	2.1	3.5	0.0	0.0	0.0
<b>COLORADO</b>																			
CO Non-MSA	42	4,762	1.5	184	0.0	0.0	0.0	1.0	0.0	1.6	52.1	83.3	64.1	46.8	16.7	34.2	0.0	0.0	0.0
Colorado Springs	0	0	0.0	104	7.0	0.0	1.9	20.7	0.0	6.7	42.1	0.0	50.0	30.2	0.0	41.3	0.1	0.0	0.0
Denver Aurora Lakewood	3	198	0.1	408	8.1	0.0	5.9	19.0	0.0	6.9	30.5	0.0	34.1	41.9	100.0	53.2	0.5	0.0	0.0
Grand Junction	4	585	0.1	194	0.0	0.0	0.0	12.0	0.0	3.1	47.4	75.0	48.5	40.7	25.0	48.5	0.0	0.0	0.0
Pueblo Canon City	5	1,301	0.2	64	2.1	0.0	0.0	19.4	0.0	6.3	45.6	100.0	60.9	32.7	0.0	28.1	0.2	0.0	4.7

<b>ARIZONA</b>																			
Prescott	4	605	0.1	56	0.0	0.0	0.0	19.3	0.0	16.1	54.5	50.0	51.8	26.2	50.0	32.1	0.0	0.0	0.0
Flagstaff	1	110	0.0	16	0.0	0.0	0.0	16.7	0.0	6.3	30.6	100.0	50.0	52.2	0.0	43.8	0.5	0.0	0.0
Phoenix	12	2,047	0.4	126	4.6	0.0	2.4	32.5	50.0	52.4	57.8	50.0	43.7	5.1	0.0	1.6	0.0	0.0	0.0
Tucson	0	0	0.0	89	4.8	0.0	1.1	22.8	0.0	12.4	34.2	0.0	36.0	37.9	0.0	50.6	0.2	0.0	0.0
Yuma	4	1,125	0.1	90	0.0	0.0	0.0	21.1	25.0	16.7	49.5	25.0	48.9	29.4	50.0	34.4	0.0	0.0	0.0
<b>WASHINGTON</b>																			
Spokane	0	0	0.0	204	0.7	0.0	0.0	13.1	0.0	6.9	48.2	0.0	55.4	37.9	0.0	37.7	0.0	0.0	0.0
Wenatchee	32	6,175	1.1	206	0.0	0.0	0.0	14.4	0.0	7.3	77.0	100.0	90.3	8.6	0.0	2.4	0.0	0.0	0.0
WA Non-MSA	18	3,144	0.6	435	0.6	0.0	0.0	20.9	27.8	20.0	64.7	72.2	63.7	13.8	0.0	16.3	0.0	0.0	0.0
<b>UTAH</b>																			
Ogden-Clearfield	7	375	0.3	128	0.0	0.0	0.0	18.5	0.0	6.3	69.4	28.6	82.0	12.1	71.4	11.7	0.0	0.0	0.0
Salt Lake City-Provo-Orem	2	70	0.1	23	0.0	0.0	0.0	0.0	0.0	0.0	49.6	100.0	47.8	50.5	0.0	52.2	0.0	0.0	0.0
Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; 2019 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
<b>MONTANA</b>																			
MT Non-MSA	1,028	103,761	29.6	1,998	0.3	0.2	0.1	20.6	20.3	20.5	59.8	77.0	74.8	19.3	2.4	4.6	0.0	0.0	0.0
Billings	35	3,527	1.0	398	1.3	0.0	0.0	14.0	14.3	12.8	66.3	77.1	69.8	18.4	8.6	17.3	0.0	0.0	0.0
Great Falls	46	4,663	1.3	158	0.0	0.0	0.0	8.7	0.0	0.6	76.0	93.5	89.2	15.3	6.5	10.1	0.0	0.0	0.0
Missoula	8	361	0.2	35	2.6	12.5	8.6	14.7	0.0	5.7	69.3	75.0	80.0	13.5	12.5	5.7	0.0	0.0	0.0

<b>IDAHO</b>																			
Coeur d'Alene	0	0	0.0	48	0.0	0.0	0.0	16.0	0.0	2.1	70.3	0.0	93.8	13.7	0.0	4.2	0.0	0.0	0.0
Boise City	7	343	0.2	366	4.6	0.0	1.1	22.1	28.6	25.4	46.6	42.9	51.4	26.8	28.6	22.1	0.0	0.0	0.0
Idaho Falls Rexburg Blackfoot	5	312	0.1	724	2.3	0.0	1.0	4.0	0.0	0.4	72.6	40.0	78.0	21.0	60.0	20.6	0.0	0.0	0.0
Pocatello	6	643	0.2	95	1.1	0.0	1.1	10.7	0.0	0.0	69.8	66.7	90.5	18.4	33.3	8.4	0.0	0.0	0.0
ID Non-MSA	9	633	0.3	153	0.0	0.0	0.0	1.4	0.0	1.3	73.6	100.0	69.9	24.9	0.0	28.8	0.0	0.0	0.0
<b>WYOMING</b>																			
WY Non-MSA	454	38,875	13.1	632	0.0	0.0	0.0	27.5	41.2	35.8	66.0	54.8	59.5	6.6	4.0	4.7	0.0	0.0	0.0
Casper	11	1,186	0.3	96	10.0	0.0	6.3	12.4	0.0	2.1	46.8	36.4	15.6	30.8	63.6	76.0	0.0	0.0	0.0
<b>COLORADO</b>																			
CO Non-MSA	30	3,317	0.9	146	0.0	0.0	0.0	1.2	0.0	2.1	51.6	90.0	64.4	47.2	10.0	33.6	0.0	0.0	0.0
Colorado Springs	1	20	0.0	74	7.4	0.0	2.7	21.2	0.0	9.5	41.7	0.0	54.1	29.7	100.0	33.8	0.1	0.0	0.0
Denver Aurora Lakewood	2	195	0.1	291	8.2	0.0	6.5	19.8	0.0	8.2	30.3	0.0	38.1	41.2	100.0	47.1	0.4	0.0	0.0
Grand Junction	3	320	0.1	162	0.0	0.0	0.0	11.8	0.0	3.7	45.7	66.7	46.3	42.5	33.3	50.0	0.0	0.0	0.0
Pueblo Canon City	7	1,003	0.2	67	2.0	0.0	0.0	21.0	14.3	11.9	43.9	71.4	68.7	33.0	14.3	19.4	0.1	0.0	0.0
<b>ARIZONA</b>																			
Prescott	6	314	0.2	62	0.0	0.0	0.0	18.9	0.0	19.4	54.8	66.7	54.8	26.3	33.3	25.8	0.0	0.0	0.0
Flagstaff	2	190	0.1	18	0.0	0.0	0.0	15.3	0.0	11.1	31.4	100.0	55.6	52.9	0.0	33.3	0.4	0.0	0.0
Lake Havasu	0	0	0.0	49	0.0	0.0	0.0	5.2	0.0	10.2	81.0	0.0	83.7	13.9	0.0	6.1	0.0	0.0	0.0
Phoenix	21	2,218	0.6	624	6.8	0.0	3.8	19.5	47.6	22.9	31.7	52.4	31.9	41.7	0.0	40.5	0.3	0.0	0.8
Tucson	0	0	0.0	90	5.2	0.0	2.2	22.0	0.0	14.4	32.9	0.0	34.4	39.6	0.0	48.9	0.3	0.0	0.0
Yuma	28	5,018	0.8	84	0.0	0.0	0.0	21.8	32.1	29.8	48.8	42.9	41.7	29.5	25.0	28.6	0.0	0.0	0.0
<b>WASHINGTON</b>																			
Spokane	1	320	0.0	197	1.2	0.0	0.0	14.7	0.0	7.1	46.3	0.0	59.9	37.8	0.0	32.5	0.1	100.0	0.5
Wenatchee	83	9,898	2.4	253	0.0	0.0	0.0	14.5	6.0	23.7	76.4	94.0	72.3	9.1	0.0	4.0	0.0	0.0	0.0
WA Non-MSA	66	4,773	1.9	562	0.5	0.0	0.2	19.9	12.1	20.5	65.6	86.4	61.7	14.0	1.5	17.6	0.0	0.0	0.0

<b>UTAH</b>																			
Ogden-Clearfield	17	1,298	0.5	202	2.6	0.0	1.0	15.4	5.9	8.9	49.3	41.2	66.8	32.7	52.9	23.3	0.0	0.0	0.0
Salt Lake City-Provo-Orem	6	484	0.2	95	2.0	0.0	0.0	17.5	0.0	8.4	42.0	100.0	61.1	38.1	0.0	30.5	0.3	0.0	0.0
<b>NEVADA</b>																			
Reno-Carson City	0	0	0.0	75	4.7	0.0	1.3	15.7	0.0	13.3	37.6	0.0	41.3	40.7	0.0	42.7	1.3	0.0	1.3
Source: 2020 D&B Data; 01/01/2020 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2021
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
<b>MONTANA</b>																			
MT Non-MSA	1,621	109,855	32.9	--	0.3	0.1	--	19.1	22.3	--	61.6	76.3	--	19.0	1.4	--	0.0	0.0	--
Billings	65	2,976	1.3	--	1.1	0.0	--	14.1	20.0	--	66.0	75.4	--	18.9	4.6	--	0.0	0.0	--
Great Falls	83	5,071	1.7	--	0.0	0.0	--	7.5	0.0	--	77.5	92.8	--	15.0	7.2	--	0.0	0.0	--
Missoula	10	400	0.2	--	2.7	0.0	--	13.5	10.0	--	68.6	90.0	--	15.3	0.0	--	0.0	0.0	--
<b>IDAHO</b>																			
Coeur d'Alene	2	185	0.0	--	0.0	0.0	--	16.5	50.0	--	69.7	50.0	--	13.8	0.0	--	0.0	0.0	--
Boise City	5	225	0.1	--	4.1	0.0	--	21.7	40.0	--	46.9	60.0	--	27.2	0.0	--	0.0	0.0	--

Idaho Falls Rexburg Blackfoot	4	294	0.1	--	2.3	0.0	--	3.7	0.0	--	73.1	100.0	--	20.9	0.0	--	0.0	0.0	--
Pocatello	5	309	0.1	--	1.1	0.0	--	10.9	0.0	--	65.9	60.0	--	22.0	40.0	--	0.0	0.0	--
ID Non-MSA	10	986	0.2	--	0.0	0.0	--	1.8	10.0	--	75.1	90.0	--	23.1	0.0	--	0.0	0.0	--
<b>WYOMING</b>																			
WY Non-MSA	678	44,238	13.8	--	0.0	0.0	--	22.8	42.5	--	71.7	54.7	--	5.5	2.8	--	0.0	0.0	--
Casper	12	931	0.2	--	8.7	0.0	--	11.4	0.0	--	49.8	25.0	--	30.1	75.0	--	0.0	0.0	--
<b>COLORADO</b>																			
CO Non-MSA	41	3,009	0.8	--	0.0	0.0	--	1.3	0.0	--	50.2	78.0	--	48.5	22.0	--	0.0	0.0	--
Colorado Springs	0	0	0.0	--	6.9	0.0	--	20.9	0.0	--	42.2	0.0	--	30.0	0.0	--	0.0	0.0	--
Denver Aurora Lakewood	1	297	0.0	--	8.1	0.0	--	20.1	100.0	--	30.5	0.0	--	41.0	0.0	--	0.4	0.0	--
Grand Junction	6	1,300	0.1	--	0.0	0.0	--	11.7	0.0	--	45.6	50.0	--	42.8	50.0	--	0.0	0.0	--
Pueblo Canon City	10	2,448	0.2	--	2.0	0.0	--	21.2	0.0	--	43.3	80.0	--	33.3	20.0	--	0.1	0.0	--
<b>ARIZONA</b>																			
Prescott	5	707	0.1	--	0.0	0.0	--	20.7	40.0	--	55.1	40.0	--	24.2	20.0	--	0.0	0.0	--
Flagstaff	2	98	0.0	--	0.0	0.0	--	13.9	0.0	--	29.4	100.0	--	56.1	0.0	--	0.6	0.0	--
Lake Havasu	0	0	0.0	--	0.0	0.0	--	4.9	0.0	--	79.7	0.0	--	15.4	0.0	--	0.0	0.0	--
Phoenix	20	4,526	0.4	--	7.0	0.0	--	19.6	35.0	--	31.4	60.0	--	41.7	5.0	--	0.3	0.0	--
Tucson	--	--	0.0	--	5.9	0.0	--	21.6	0.0	--	33.0	0.0	--	39.2	0.0	--	0.3	0.0	--
Yuma	21	4,030	0.8	--	0.0	0.0	--	21.1	14.3	--	48.8	57.1	--	30.1	28.6	--	0.0	0.0	--
<b>WASHINGTON</b>																			
Spokane	2	23	0.0	--	1.2	0.0	--	15.7	0.0	--	45.5	0.0	--	37.5	100.0	--	0.1	0.0	--
Wenatchee	60	9,150	1.2	--	0.0	0.0	--	14.1	3.3	--	76.3	96.7	--	9.6	0.0	--	0.0	0.0	--
WA Non-MSA	54	5,319	1.1	--	0.5	0.0	--	20.4	27.8	--	65.8	70.4	--	13.4	1.9	--	0.0	0.0	--
<b>UTAH</b>																			
Ogden-Clearfield	14	825	0.3	--	2.5	0.0	--	14.5	0.0	--	49.6	28.6	--	33.4	71.4	--	0.0	0.0	--

Salt Lake City-Provo-Orem	1	412	0.0	--	2.3	0.0	--	17.2	0.0	--	41.2	100.0	--	39.0	0.0	--	0.4	0.0	--
<b>NEVADA</b>																			
Reno-Carson City	0	0	0.0	--	4.9	0.0	--	15.7	0.0	--	39.0	0.0	--	39.3	0.0	--	1.1	0.0	--
Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%																			

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
<b>MONTANA</b>																			
MT Non-MSA	2,686	609,578	24.2	18,871	20.0	4.4	3.3	18.2	13.8	12.7	21.5	19.4	21.5	40.2	54.0	48.0	0.0	8.4	14.6
Billings	499	91,174	4.5	6,982	19.4	8.4	5.8	18.2	24.2	16.8	21.8	25.9	23.2	40.7	36.9	35.3	0.0	4.6	18.9
Great Falls	11	1,125	0.1	3,166	19.8	9.1	5.3	18.5	--	16.6	22.1	18.2	22.3	39.6	27.3	34.1	0.0	45.5	21.7
Missoula	505	96,744	4.5	4,460	21.0	5.5	4.7	18.2	15.2	16.6	20.8	20.2	23.3	39.9	50.9	43.3	0.0	8.1	12.1
<b>IDAHO</b>																			
Coeur d'Alene	951	240,041	8.6	11,525	18.0	3.4	3.1	20.3	14.5	12.4	22.7	25.6	24.0	39.0	53.1	47.1	0.0	3.5	13.4
Boise City	349	66,452	3.1	46,162	18.9	7.7	5.3	18.6	21.8	18.2	21.8	21.5	25.0	40.7	41.5	40.8	0.0	7.5	10.8
Idaho Falls Rexburg Blackfoot	189	47,028	1.7	10,870	20.7	3.7	6.1	18.3	10.6	17.0	20.3	12.7	24.0	40.8	63.5	40.5	0.0	9.5	12.4
Pocatello	367	65,047	3.3	3,964	20.9	5.5	6.2	19.5	11.2	17.0	20.0	24.0	22.8	39.6	51.8	42.8	0.0	7.6	11.3

ID Non-MSA	541	123,556	4.9	5,064	17.2	3.7	2.3	16.7	14.4	8.9	19.7	19.4	16.9	46.4	60.6	61.1	0.0	1.8	10.8
<b>WYOMING</b>																			
WY Non-MSA	562	96,394	5.1	4,948	21.0	10.9	7.6	19.0	21.7	19.8	21.8	27.6	25.2	38.1	34.2	29.6	0.0	5.7	17.7
<b>COLORADO</b>																			
CO Non-MSA	161	32,341	1.4	6,875	15.2	6.2	3.2	15.9	15.5	10.5	20.6	18.0	17.3	48.4	51.6	55.1	0.0	8.7	14.0
Colorado Springs	34	8,635	0.3	50,869	20.4	5.9	5.5	18.5	2.9	17.8	20.3	17.6	22.2	40.8	35.3	30.5	0.0	38.2	24.1
Denver Aurora Lakewood	101	51,559	0.9	195,754	21.6	2.0	5.6	17.5	2.0	18.3	20.4	5.9	22.9	40.5	29.7	37.0	0.0	60.4	16.2
Grand Junction	30	5,652	0.3	10,098	21.6	--	6.8	18.0	13.3	21.0	19.9	23.3	22.5	40.5	46.7	33.8	0.0	16.7	15.8
Pueblo Canon City	52	10,179	0.5	10,021	23.4	21.2	8.6	18.7	15.4	21.7	19.2	21.2	22.5	38.7	26.9	29.1	0.0	15.4	18.1
<b>ARIZONA</b>																			
Prescott	20	4,328	0.2	13,395	18.8	--	7.2	19.3	10.0	15.0	22.4	15.0	21.9	39.6	50.0	38.5	0.0	25.0	17.4
Flagstaff	8	3,547	0.1	5,700	24.0	12.5	3.2	15.6	12.5	12.9	17.2	--	19.1	43.2	62.5	48.6	0.0	12.5	16.2
Phoenix	6	10,856	0.1	29,530	23.7	--	6.7	21.6	--	22.0	22.9	33.3	23.5	31.7	--	22.6	0.0	66.7	25.1
Tucson	3	2,693	0.0	47,472	22.2	--	4.7	17.3	--	14.8	19.1	33.3	18.9	41.4	33.3	37.9	0.0	33.3	23.6
Yuma	35	7,219	0.3	7,010	20.0	2.9	4.0	19.1	8.6	12.8	19.6	8.6	20.0	41.3	48.6	36.5	0.0	31.4	26.7
<b>WASHINGTON</b>																			
Spokane	383	113,568	3.4	26,303	20.1	2.6	5.0	16.8	11.2	15.4	22.0	18.5	22.8	41.2	62.9	41.6	0.0	4.7	15.2
Wenatchee	101	33,724	0.9	5,022	19.1	3.0	3.2	19.1	7.9	10.3	22.3	14.9	21.8	39.6	66.3	52.6	0.0	7.9	12.1
WA Non-MSA	51	9,351	0.5	4,554	24.0	13.7	4.4	19.7	13.7	14.1	22.1	25.5	23.2	34.2	41.2	41.6	0.0	5.9	16.8
<b>UTAH</b>																			
Ogden-Clearfield	37	7,551	0.3	4,115	19.7	8.1	8.8	22.9	21.6	24.0	23.4	29.7	26.7	34.0	29.7	25.6	0.0	10.8	14.8
Salt Lake City-Provo-Orem	41	13,413	0.4	3,372	10.9	--	0.9	9.2	4.9	4.3	15.8	22.0	9.0	64.0	68.3	76.4	0.0	4.9	9.3
Source: 2015 ACS Census ; 01/01/2019 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			



Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
<b>MONTANA</b>																			
MT Non-MSA	3,553	967,719	21.8	29,371	20.0	4.6	2.7	18.2	12.7	11.6	21.5	19.3	19.7	40.2	55.2	49.0	0.0	8.2	17.0
Billings	695	138,208	4.3	11,239	19.4	7.2	4.5	18.2	22.2	16.1	21.8	23.7	20.7	40.7	40.9	38.3	0.0	6.0	20.4
Great Falls	30	6,160	0.2	4,459	19.8	3.3	5.0	18.5	6.7	16.1	22.1	16.7	19.1	39.6	53.3	30.9	0.0	20.0	28.8
Missoula	784	192,316	4.8	7,562	21.0	6.9	6.0	18.2	15.2	17.9	20.8	22.7	24.5	39.9	46.3	38.5	0.0	8.9	13.1
<b>IDAHO</b>																			
Coeur d'Alene	1,346	360,382	8.2	17,221	18.0	3.3	3.8	20.3	14.3	14.2	22.7	22.4	22.3	39.0	53.6	43.8	0.0	6.5	16.0
Boise City	450	92,718	2.8	66,291	18.9	6.4	5.1	18.6	13.8	16.8	21.8	24.4	23.9	40.7	46.7	42.1	0.0	8.7	12.2
Idaho Falls Rexburg Blackfoot	311	76,413	1.9	17,186	20.7	4.2	4.0	18.3	11.9	15.6	20.3	17.4	23.0	40.8	60.1	43.8	0.0	6.4	13.6
Pocatello	470	95,283	2.9	5,631	20.9	2.6	4.6	19.5	19.6	16.2	20.0	21.5	23.4	39.6	48.3	42.4	0.0	8.1	13.4
ID Non-MSA	669	165,640	4.1	7,330	17.2	2.8	1.7	16.7	11.1	8.2	19.7	21.7	18.0	46.4	62.3	60.6	0.0	2.1	11.6
<b>WYOMING</b>																			
WY Non-MSA	983	205,652	6.0	8,081	21.0	9.4	5.5	19.0	23.4	17.6	21.8	24.4	22.8	38.1	35.5	32.6	0.0	7.3	21.5
Casper	109	24,303	0.7	4,994	21.1	9.2	6.6	16.4	4.6	19.5	21.7	5.5	19.6	40.7	44.0	26.4	0.0	36.7	27.9
<b>COLORADO</b>																			
CO Non-MSA	185	43,148	1.1	10,932	15.2	7.6	2.7	15.9	11.4	10.6	20.6	21.6	19.3	48.4	47.0	53.4	0.0	12.4	14.1
Colorado Springs	48	12,231	0.3	76,478	20.4	4.2	3.6	18.5	8.3	15.1	20.3	18.8	19.5	40.8	39.6	30.7	0.0	29.2	31.1

Denver Aurora Lakewood	92	49,209	0.6	288,499	21.6	1.1	5.6	17.5	7.6	18.6	20.4	3.3	23.1	40.5	28.3	37.1	0.0	59.8	15.7
Grand Junction	72	13,354	0.4	14,276	21.6	4.2	5.1	18.0	16.7	19.4	19.9	26.4	22.1	40.5	33.3	35.8	0.0	19.4	17.7
Pueblo Canon City	73	12,463	0.4	13,258	23.4	13.7	5.5	18.7	9.6	15.9	19.2	19.2	23.4	38.7	41.1	33.6	0.0	16.4	21.5
<b>ARIZONA</b>																			
Prescott	290	82,108	1.8	19,745	18.8	4.1	4.4	19.3	13.4	13.9	22.4	20.7	20.3	39.6	51.7	41.0	0.0	10.0	20.4
Flagstaff	22	5,846	0.1	9,946	24.0	--	2.3	15.6	9.1	11.8	17.2	27.3	19.2	43.2	63.6	51.3	0.0	--	15.4
Lake Havasu	297	80,711	1.8	16,110	18.5	2.0	3.6	19.3	9.8	11.5	22.2	11.8	16.0	40.0	69.7	45.2	0.0	6.7	23.7
Phoenix	108	57,948	0.7	436,923	21.9	4.6	4.7	17.3	9.3	16.8	19.5	15.7	20.5	41.3	44.4	38.9	0.0	25.9	19.1
Tucson	12	4,778	0.1	74,096	22.2	--	4.7	17.3	--	14.0	19.1	--	18.8	41.4	66.7	36.4	0.0	33.3	26.1
Yuma	28	7,312	0.2	10,426	20.0	3.6	3.3	19.1	14.3	13.5	19.6	14.3	16.7	41.3	28.6	33.7	0.0	39.3	32.8
<b>WASHINGTON</b>																			
Spokane	560	162,301	3.4	38,265	20.1	2.1	4.0	16.8	10.4	14.9	22.0	19.1	22.2	41.2	62.0	43.0	0.0	6.4	15.9
Wenatchee	138	52,450	0.8	7,998	19.1	--	2.1	19.1	4.3	9.5	22.3	15.2	19.4	39.6	60.1	55.4	0.0	20.3	13.6
WA Non-MSA	74	15,870	0.5	6,878	24.0	2.7	3.6	19.7	20.3	14.3	22.1	27.0	20.6	34.2	44.6	47.1	0.0	5.4	14.4
<b>UTAH</b>																			
Ogden-Clearfield	126	41,456	0.8	73,281	17.6	4.8	6.1	19.3	21.4	21.6	24.1	16.7	25.7	39.1	37.3	30.1	0.0	19.8	16.4
Salt Lake City-Provo-Orem	54	20,432	0.3	112,621	19.5	--	5.2	17.3	14.8	20.0	21.7	18.5	24.8	41.4	61.1	38.2	0.0	5.6	11.8
<b>NEVADA</b>																			
Reno-Carson City	84	24,660	0.5	45,196	20.8	2.4	3.8	17.2	6.0	14.1	20.7	9.5	22.4	41.3	44.0	40.9	0.0	38.1	18.9

Source: 2015 ACS Census ; 01/01/2020 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2021
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
<b>MONTANA</b>																			
MT Non-MSA	3,116	957,839	22.4	--	20.1	4.9	--	18.2	11.4	--	21.5	17.8	--	40.1	57.0	--	0.0	8.8	--
Billings	637	135,558	4.6	--	19.4	10.8	--	18.2	22.3	--	21.8	25.0	--	40.7	36.6	--	0.0	5.3	--
Great Falls	24	20,882	0.2	--	19.8	4.2	--	18.5	12.5	--	22.1	29.2	--	39.6	25.0	--	0.0	29.2	--
Missoula	586	198,433	4.2	--	21.0	2.7	--	18.2	8.5	--	20.8	17.6	--	39.9	61.9	--	0.0	9.2	--
<b>IDAHO</b>																			
Coeur d'Alene	1,047	379,796	7.5	--	18.0	2.5	--	20.3	10.6	--	22.7	20.7	--	39.0	60.0	--	0.0	6.2	--
Boise City	346	81,039	2.5	--	18.9	6.4	--	18.6	13.3	--	21.8	18.5	--	40.7	51.2	--	0.0	10.7	--
Idaho Falls Rexburg Blackfoot	241	66,653	1.7	--	20.7	2.1	--	18.3	10.4	--	20.3	22.4	--	40.8	53.5	--	0.0	11.6	--
Pocatello	357	86,261	2.6	--	20.9	5.3	--	19.5	13.2	--	20.0	18.5	--	39.6	52.7	--	0.0	10.4	--
ID Non-MSA	556	175,224	4.0	--	17.2	2.0	--	16.7	9.7	--	19.7	20.9	--	46.4	64.2	--	0.0	3.2	--
<b>WYOMING</b>																			
WY Non-MSA	783	185,173	5.6	--	20.5	10.3	--	19.1	23.0	--	22.3	22.9	--	38.1	34.9	--	0.0	8.9	--
Casper	146	48,165	1.0	--	21.1	4.8	--	16.4	13.7	--	21.7	21.9	--	40.7	28.8	--	0.0	30.8	--
<b>COLORADO</b>																			
CO Non-MSA	163	47,984	1.2	--	15.2	8.0	--	15.9	16.6	--	20.6	22.7	--	48.4	42.9	--	0.0	9.8	--
Colorado Springs	56	21,743	0.4	--	20.4	--	--	18.5	3.6	--	20.3	5.4	--	40.8	21.4	--	0.0	69.6	--

Denver Aurora Lakewood	97	60,587	0.7	--	21.6	2.1	--	17.5	4.1	--	20.4	1.0	--	40.5	19.6	--	0.0	73.2	--
Grand Junction	50	11,314	0.4	--	21.6	4.0	--	18.0	16.0	--	19.9	30.0	--	40.5	34.0	--	0.0	16.0	--
Pueblo Canon City	72	12,212	0.5	--	23.4	16.7	--	18.7	15.3	--	19.2	18.1	--	38.7	31.9	--	0.0	18.1	--
<b>ARIZONA</b>																			
Prescott	216	70,970	1.6	--	18.8	1.9	--	19.3	6.9	--	22.4	15.7	--	39.6	67.1	--	0.0	8.3	--
Flagstaff	30	17,250	0.2	--	24.0	--	--	15.6	10.0	--	17.2	13.3	--	43.2	50.0	--	0.0	26.7	--
Lake Havasu	219	67,851	1.6	--	18.5	2.7	--	19.3	9.1	--	22.2	9.1	--	40.0	67.1	--	0.0	11.9	--
Phoenix	77	54,328	0.6	--	21.9	--	--	17.3	7.8	--	19.5	6.5	--	41.3	57.1	--	0.0	28.6	--
Tucson	11	4,053	0.1	--	22.2	--	--	17.3	--	--	19.1	27.3	--	41.4	54.5	--	0.0	18.2	--
Yuma	37	19,742	0.3	--	20.0	--	--	19.1	5.4	--	19.6	8.1	--	41.3	29.7	--	0.0	56.8	--
<b>WASHINGTON</b>																			
Spokane	414	128,165	3.0	--	20.1	2.2	--	16.8	14.0	--	22.0	19.3	--	41.2	58.7	--	0.0	5.8	--
Wenatchee	103	34,132	0.7	--	19.1	1.9	--	19.1	10.7	--	22.3	20.4	--	39.6	57.3	--	0.0	9.7	--
WA Non-MSA	81	18,312	0.6	--	24.0	3.7	--	19.7	12.3	--	22.1	27.2	--	34.2	53.1	--	0.0	3.7	--
<b>UTAH</b>																			
Ogden-Clearfield	154	57,413	1.1	--	17.6	6.5	--	19.3	14.9	--	24.1	24.7	--	39.1	36.4	--	0.0	17.5	--
Salt Lake City-Provo-Orem	220	103,129	1.6	--	19.5	5.5	--	17.3	12.3	--	21.7	20.0	--	41.4	54.5	--	0.0	7.7	--
<b>NEVADA</b>																			
Reno-Carson City	110	49,772	0.8	--	20.8	3.6	--	17.2	8.2	--	20.7	10.0	--	41.3	36.4	--	0.0	41.8	--
Source: 2015 ACS Census ; 01/01/2021 - 12/31/2021 Bank Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
<b>MONTANA</b>											
MT Non-MSA	1,845	224,553	36.6	15,031	87.5	70.0	49.3	4.0	29.2	8.6	0.8
Billings	266	35,151	5.3	4,570	85.5	66.2	47.3	5.0	33.8	9.5	0.0
Great Falls	32	2,992	0.6	1,600	82.9	65.6	49.5	5.5	34.4	11.7	0.0
Missoula	642	83,767	12.7	3,565	87.8	58.1	49.8	4.4	41.0	7.8	0.9
<b>IDAHO</b>											
Coeur d'Alene	175	36,427	3.5	3,969	88.7	51.4	50.6	4.2	48.0	7.1	0.6
Boise City	237	39,160	4.7	15,184	88.1	35.4	49.0	3.9	64.1	8.0	0.4
Idaho Falls Rexburg Blackfoot	123	27,104	2.4	5,262	85.0	57.7	49.7	4.9	42.3	10.1	0.0
Pocatello	86	15,111	1.7	1,351	81.7	58.1	48.5	4.8	41.9	13.5	0.0
ID Non-MSA	160	17,135	3.2	2,772	87.8	58.1	56.3	4.3	41.9	7.9	0.0
<b>WYOMING</b>											
WY Non-MSA	463	41,926	9.2	2,948	77.5	77.1	49.4	5.6	21.6	16.9	1.3
<b>COLORADO</b>											
CO Non-MSA	225	29,305	4.5	4,329	89.4	72.9	51.9	3.4	27.1	7.2	0.0
Colorado Springs	47	13,719	0.9	15,387	90.2	53.2	54.9	2.8	46.8	7.0	0.0
Denver Aurora Lakewood	110	41,265	2.2	84,630	90.0	45.5	52.2	3.5	52.7	6.5	1.8
Grand Junction	90	19,980	1.8	3,820	88.0	35.6	49.0	3.7	64.4	8.4	0.0
Pueblo Canon City	98	16,990	1.9	3,066	86.9	56.1	48.0	3.4	43.9	9.7	0.0
<b>ARIZONA</b>											
Prescott	67	16,502	1.3	5,766	90.3	50.7	52.9	2.9	49.3	6.8	0.0
Flagstaff	30	6,773	0.6	2,808	84.1	66.7	50.0	4.4	30.0	11.5	3.3
Phoenix	12	2,195	0.2	4,538	91.2	75.0	56.5	1.9	25.0	6.9	0.0
Tucson	4	1,610	0.1	18,774	87.6	50.0	49.4	3.7	50.0	8.7	0.0

Yuma	88	22,199	1.7	2,326	81.6	51.1	41.8	5.1	47.7	13.3	1.1
<b>WASHINGTON</b>											
Spokane	78	18,952	1.5	8,506	84.8	24.4	49.2	5.0	74.4	10.2	1.3
Wenatchee	59	9,456	1.2	2,273	83.9	61.0	46.2	4.8	39.0	11.2	0.0
WA Non-MSA	31	4,623	0.6	1,913	81.5	74.2	51.2	4.6	25.8	13.9	0.0
<b>UTAH</b>											
Ogden-Clearfield	9	720	0.2	1,127	85.9	66.7	48.3	3.4	33.3	10.7	0.0
Salt Lake City-Provo-Orem	15	5,093	0.3	2,299	90.1	26.7	48.4	3.5	73.3	6.4	0.0
Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; 2019 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											

Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
<b>MONTANA</b>											
MT Non-MSA	5,750	446,438	29.3	16,319	88.7	68.3	52.7	3.5	23.2	7.8	8.5
Billings	817	74,385	4.2	4,983	86.6	71.1	49.0	4.5	28.6	8.9	0.2
Great Falls	104	9,384	0.5	1,852	83.9	69.2	47.2	4.9	30.8	11.2	0.0
Missoula	1,655	181,414	8.4	4,123	88.7	56.6	49.1	3.9	34.1	7.4	9.3
<b>IDAHO</b>											
Coeur d'Alene	897	88,152	4.6	4,337	91.3	68.8	52.6	3.1	28.0	5.6	3.2
Boise City	891	87,612	4.5	15,868	90.2	62.9	44.4	3.1	34.2	6.7	2.9
Idaho Falls Rexburg Blackfoot	391	50,782	2.0	6,594	87.2	57.8	47.7	3.8	29.7	9.1	12.5
Pocatello	335	32,339	1.7	1,601	85.4	71.9	48.1	3.7	27.5	10.8	0.6
ID Non-MSA	834	46,713	4.2	3,746	89.4	71.0	54.2	3.6	22.8	7.0	6.2
<b>WYOMING</b>											
WY Non-MSA	1,406	98,954	7.2	3,388	76.9	77.8	56.5	5.6	21.8	17.6	0.4
Casper	228	48,946	1.2	2,324	78.8	57.0	54.3	6.9	43.0	14.3	0.0
<b>COLORADO</b>											
CO Non-MSA	649	50,034	3.3	5,487	90.5	78.4	43.8	2.9	21.1	6.6	0.5
Colorado Springs	180	24,803	0.9	15,365	91.4	62.8	43.8	2.4	37.2	6.2	0.0
Denver Aurora Lakewood	584	97,622	3.0	94,142	91.3	55.5	40.8	2.9	43.3	5.8	1.2
Grand Junction	274	36,253	1.4	4,299	89.4	53.3	44.1	3.0	46.7	7.6	0.0
Pueblo Canon City	417	43,526	2.1	3,085	88.2	67.6	44.9	3.0	32.4	8.8	0.0
<b>ARIZONA</b>											
Prescott	516	55,560	2.6	6,100	92.2	63.4	48.8	2.3	36.6	5.6	0.0
Flagstaff	214	21,650	1.1	3,573	87.7	71.0	44.5	3.3	28.5	9.0	0.5
Lake Havasu	302	30,643	1.5	3,698	89.6	57.0	45.0	3.0	42.4	7.4	0.7

Phoenix	153	25,189	0.8	123,870	93.1	56.9	40.3	2.2	43.1	4.7	0.0
Tucson	59	6,919	0.3	19,825	90.7	69.5	42.5	2.7	28.8	6.6	1.7
Yuma	313	45,536	1.6	2,528	85.3	53.7	40.1	4.0	45.4	10.8	1.0
<b>WASHINGTON</b>											
Spokane	358	46,954	1.8	9,503	88.6	43.9	41.1	3.6	53.4	7.8	2.8
Wenatchee	272	27,912	1.4	3,065	88.1	57.4	31.4	3.5	30.5	8.4	12.1
WA Non-MSA	303	19,404	1.5	2,538	85.1	66.7	46.1	3.6	23.8	11.3	9.6
<b>UTAH</b>											
Ogden-Clearfield	372	36,745	1.9	12,056	88.2	60.2	41.5	3.3	39.8	8.5	0.0
Salt Lake City-Provo-Orem	251	35,805	1.3	31,586	87.9	55.4	41.6	4.2	44.6	7.9	0.0
<b>NEVADA</b>											
Reno-Carson City	1,045	133,107	5.3	16,446	82.6	36.7	42.7	5.9	32.0	11.5	31.3

Source: 2020 D&B Data; 01/01/2020 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
<b>MONTANA</b>											
MT Non-MSA	3,629	308,270	30.2	--	89.4	78.1	--	3.0	21.8	7.5	0.1
Billings	525	64,756	4.4	--	87.0	72.0	--	4.0	27.8	9.0	0.2
Great Falls	90	9,159	0.7	--	84.9	75.6	--	4.5	24.4	10.6	0.0
Missoula	1,077	114,771	8.9	--	88.9	69.0	--	3.4	29.9	7.7	1.1
<b>IDAHO</b>											
Coeur d'Alene	406	50,907	3.4	--	92.3	68.7	--	2.5	31.0	5.2	0.2
Boise City	446	45,561	3.7	--	91.6	56.5	--	2.4	43.5	6.0	0.0



Idaho Falls Rexburg Blackfoot	202	37,686	1.7	--	89.1	67.3	--	3.0	32.7	7.9	0.0
Pocatello	184	22,012	1.5	--	87.2	70.1	--	3.0	29.9	9.8	0.0
ID Non-MSA	414	30,940	3.4	--	90.8	74.4	--	3.0	25.4	6.3	0.2
<b>WYOMING</b>											
WY Non-MSA	957	78,336	8.0	--	83.8	80.8	--	3.9	18.7	12.3	0.5
Casper	290	39,792	2.4	--	81.6	65.2	--	5.6	34.5	12.9	0.3
<b>COLORADO</b>											
CO Non-MSA	442	42,631	3.7	--	91.5	78.7	--	2.5	21.3	6.0	0.0
Colorado Springs	87	15,422	0.7	--	92.6	63.2	--	1.9	36.8	5.5	0.0
Denver Aurora Lakewood	375	78,495	3.1	--	92.4	58.1	--	2.4	41.9	5.2	0.0
Grand Junction	189	30,564	1.6	--	90.6	55.0	--	2.5	45.0	6.9	0.0
Pueblo Canon City	273	36,996	2.3	--	89.7	68.1	--	2.5	31.9	7.8	0.0
<b>ARIZONA</b>											
Prescott	297	48,463	2.5	--	91.8	57.2	--	1.9	42.1	6.3	0.7
Flagstaff	139	14,548	1.2	--	88.4	68.3	--	2.7	31.7	8.9	0.0
Lake Havasu	138	17,251	1.1	--	90.1	58.7	--	2.5	39.9	7.4	1.4
Phoenix	109	21,089	0.9	--	92.1	60.6	--	1.8	39.5	6.1	0.0
Tucson	40	7,216	0.3	--	90.2	65.0	--	2.2	35.0	7.5	0.0
Yuma	195	30,111	1.6	--	86.1	58.5	--	3.2	40.5	10.7	1.0
<b>WASHINGTON</b>											
Spokane	222	39,061	1.8	--	88.3	42.8	--	3.6	56.8	8.1	0.5
Wenatchee	197	24,735	1.6	--	87.7	67.0	--	3.4	33.0	9.0	0.0
WA Non-MSA	195	10,119	1.6	--	84.8	81.5	--	3.5	18.5	11.7	0.0
<b>UTAH</b>											
Ogden-Clearfield	187	25,188	1.6	--	88.4	61.5	--	3.0	38.5	8.6	0.0
Salt Lake City-Provo- Orem	142	18,488	1.2	--	88.0	57.0	--	3.9	43.0	8.2	0.0
<b>NEVADA</b>											
Reno-Carson City	587	88,632	4.9	--	82.5	58.6	--	5.9	41.1	11.6	0.3

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; "--" data not available.  
Due to rounding, totals may not equal 100.0%

Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2019
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
<b>MONTANA</b>											
MT Non-MSA	758	86,166	49.1	1,935	98.2	92.0	78.9	0.8	5.9	1.0	2.1
Billings	31	2,248	2.0	497	96.8	96.8	77.9	1.9	3.2	1.4	0.0
Great Falls	45	5,368	2.9	209	96.2	88.9	82.3	2.1	8.9	1.7	2.2
Missoula	9	606	0.6	45	98.0	100.0	64.4	1.2	0.0	0.7	0.0
<b>IDAHO</b>											
Coeur d'Alene	2	156	0.1	53	97.5	100.0	66.0	1.5	0.0	1.0	0.0
Boise City	4	647	0.3	404	95.5	75.0	61.4	3.4	25.0	1.1	0.0
Idaho Falls Rexburg Blackfoot	10	1,184	0.6	831	94.6	80.0	72.3	4.4	20.0	1.0	0.0
Pocatello	7	393	0.5	89	94.7	85.7	77.5	3.1	14.3	2.2	0.0
ID Non-MSA	5	1,307	0.3	168	96.8	40.0	56.5	2.3	60.0	0.9	0.0
<b>WYOMING</b>											
WY Non-MSA	479	43,079	31.0	651	96.5	95.0	82.5	1.4	3.5	2.1	1.5
<b>COLORADO</b>											
CO Non-MSA	42	4,762	2.7	184	98.2	100.0	70.7	0.9	0.0	0.9	0.0
Colorado Springs	--	--	--	104	96.9	--	64.4	1.6	--	1.5	--
Denver Aurora Lakewood	3	198	0.2	408	95.7	100.0	64.7	2.4	0.0	1.9	0.0
Grand Junction	4	585	0.3	194	97.9	75.0	75.8	1.6	25.0	0.5	0.0
Pueblo Canon City	5	1,301	0.3	64	96.7	80.0	57.8	2.0	20.0	1.4	0.0
<b>ARIZONA</b>											

Prescott	4	605	0.3	56	96.5	100.0	64.3	2.0	0.0	1.5	0.0
Flagstaff	1	110	0.1	16	93.8	100.0	50.0	2.9	0.0	3.3	0.0
Phoenix	12	2,047	0.8	126	96.1	83.3	34.1	2.9	16.7	1.0	0.0
Tucson	--	--	--	89	96.3	--	43.8	2.6	--	1.1	--
Yuma	4	1,125	0.3	90	80.7	75.0	37.8	12.1	25.0	7.2	0.0
<b>WASHINGTON</b>											
Spokane	--	--	--	204	95.9	--	62.3	2.4	--	1.7	--
Wenatchee	32	6,175	2.1	206	93.9	93.8	61.7	3.8	6.3	2.3	0.0
WA Non-MSA	18	3,144	1.2	435	93.2	88.9	57.0	4.5	11.1	2.3	0.0
<b>UTAH</b>											
Ogden-Clearfield	7	375	0.5	128	97.2	100.0	74.2	2.2	0.0	0.6	0.0
Salt Lake City-Provo-Orem	2	70	0.1	23	97.3	100.0	73.9	1.8	0.0	0.9	0.0
Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; 2019 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
<b>MONTANA</b>											
MT Non-MSA	1,028	103,761	52.5	1,998	98.2	89.6	76.4	0.8	10.0	1.0	0.4
Billings	35	3,527	1.8	398	97.0	97.1	79.9	1.8	0.0	1.3	2.9
Great Falls	46	4,663	2.4	158	96.6	95.7	83.5	2.1	2.2	1.4	2.2
Missoula	8	361	0.4	35	98.3	100.0	54.3	0.9	0.0	0.7	0.0
<b>IDAHO</b>											
Coeur d'Alene	--	--	--	48	98.1	--	35.4	1.1	--	0.9	--
Boise City	7	343	0.4	366	95.8	71.4	48.1	2.9	28.6	1.3	0.0
Idaho Falls Rexburg Blackfoot	5	312	0.3	724	95.2	100.0	59.7	3.9	0.0	0.9	0.0
Pocatello	6	643	0.3	95	95.7	100.0	43.2	2.7	0.0	1.6	0.0
ID Non-MSA	9	633	0.5	153	97.3	77.8	52.9	1.9	11.1	0.8	11.1
<b>WYOMING</b>											
WY Non-MSA	454	38,875	23.2	632	96.5	95.2	81.3	1.4	3.7	2.1	1.1
Casper	11	1,186	0.6	96	98.0	81.8	72.9	1.0	18.2	1.0	0.0
<b>COLORADO</b>											
CO Non-MSA	30	3,317	1.5	146	98.0	96.7	63.7	0.8	3.3	1.2	0.0
Colorado Springs	1	20	0.1	74	96.9	100.0	56.8	1.4	0.0	1.7	0.0
Denver Aurora Lakewood	2	195	0.1	291	96.0	100.0	60.1	2.1	0.0	2.0	0.0
Grand Junction	3	320	0.2	162	98.4	100.0	88.9	1.2	0.0	0.4	0.0
Pueblo Canon City	7	1,003	0.4	67	96.8	85.7	59.7	1.7	14.3	1.5	0.0
<b>ARIZONA</b>											
Prescott	6	314	0.3	62	97.3	66.7	45.2	1.6	33.3	1.1	0.0
Flagstaff	2	190	0.1	18	94.9	100.0	77.8	2.4	0.0	2.7	0.0
Lake Havasu	--	--	--	49	98.1	--	20.4	1.1	--	0.8	--

Phoenix	21	2,218	1.1	624	96.1	57.1	37.3	2.4	42.9	1.6	0.0
Tucson	--	--	--	90	96.9	--	50.0	2.0	--	1.1	--
Yuma	28	5,018	1.4	84	84.0	35.7	32.1	10.1	64.3	5.9	0.0
<b>WASHINGTON</b>											
Spokane	1	320	0.1	197	96.5	100.0	54.8	2.1	0.0	1.4	0.0
Wenatchee	83	9,898	4.2	253	93.8	72.3	53.4	3.7	16.9	2.4	10.8
WA Non-MSA	66	4,773	3.4	562	94.0	69.7	46.1	3.8	19.7	2.2	10.6
<b>UTAH</b>											
Ogden-Clearfield	17	1,298	0.9	202	97.4	88.2	57.9	1.6	11.8	1.0	0.0
Salt Lake City-Provo-Orem	6	484	0.3	95	95.9	83.3	61.1	2.2	16.7	1.8	0.0
<b>NEVADA</b>											
Reno-Carson City	--	--	--	75	95.1	--	53.3	2.8	--	2.1	--
Source: 2020 D&B Data; 01/01/2020 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
<b>MONTANA</b>											
MT Non-MSA	1,621	109,855	59.3	--	98.3	94.0	--	0.8	6.0	1.0	0.0
Billings	65	2,976	2.4	--	97.2	98.5	--	1.6	1.5	1.2	0.0
Great Falls	83	5,071	3.0	--	97.1	95.2	--	1.7	4.8	1.2	0.0
Missoula	10	400	0.4	--	98.6	90.0	--	0.8	10.0	0.6	0.0
<b>IDAHO</b>											
Coeur d'Alene	2	185	0.1	--	98.4	50.0	--	0.9	50.0	0.7	0.0
Boise City	5	225	0.2	--	96.5	80.0	--	2.3	20.0	1.1	0.0
Idaho Falls Rexburg Blackfoot	4	294	0.1	--	96.2	75.0	--	3.2	25.0	0.6	0.0
Pocatello	5	309	0.2	--	96.4	100.0	--	2.3	0.0	1.4	0.0
ID Non-MSA	10	986	0.4	--	97.9	90.0	--	1.5	10.0	0.7	0.0
<b>WYOMING</b>											
WY Non-MSA	678	44,238	24.8	--	96.9	96.2	--	1.3	3.4	1.7	0.4
Casper	12	931	0.4	--	98.2	66.7	--	0.9	33.3	0.9	0.0
<b>COLORADO</b>											
CO Non-MSA	41	3,009	1.5	--	98.3	100.0	--	0.7	0.0	1.0	0.0
Colorado Springs	--	--	--	--	97.4	--	--	1.2	--	1.4	--
Denver Aurora Lakewood	1	297	0.0	--	96.6	100.0	--	1.7	0.0	1.6	0.0
Grand Junction	6	1,300	0.2	--	98.8	66.7	--	0.7	33.3	0.5	0.0
Pueblo Canon City	10	2,448	0.4	--	97.6	60.0	--	1.3	40.0	1.1	0.0
<b>ARIZONA</b>											
Prescott	5	707	0.2	--	97.7	40.0	--	1.5	60.0	0.8	0.0
Flagstaff	2	98	0.1	--	96.4	100.0	--	1.8	0.0	1.8	0.0
Lake Havasu	--	--	--	--	98.4	--	--	0.9	--	0.7	--

Phoenix	20	4,526	0.7	--	96.7	75.0	--	2.0	20.0	1.3	5.0
Tucson	--	--	--	--	97.3	--	--	1.7	--	1.0	--
Yuma	21	4,030	0.8	--	86.5	33.3	--	8.5	66.7	5.0	0.0
<b>WASHINGTON</b>											
Spokane	2	23	0.1	--	96.7	100.0	--	2.0	0.0	1.3	0.0
Wenatchee	60	9,150	2.2	--	93.8	85.0	--	3.5	15.0	2.6	0.0
WA Non-MSA	54	5,319	2.0	--	93.9	88.9	--	3.8	11.1	2.3	0.0
<b>UTAH</b>											
Ogden-Clearfield	14	825	0.5	--	97.7	92.9	--	1.4	7.1	0.9	0.0
Salt Lake City-Provo-Orem	1	412	0.0	--	96.5	100.0	--	1.9	0.0	1.5	0.0
<b>NEVADA</b>											
Reno-Carson City	--	--	--	--	95.0	--	--	2.9	--	2.1	--
Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%											

## DESCRIPTION OF LIMITED-SCOPE ASSESSMENT AREAS

### MONTANA

#### Missoula

The Missoula AA is located on the western border of Montana and consists of the entirety of the Missoula MSA. There were no changes to the AA since the previous evaluation. The AA includes 1 low-, 3 moderate-, 13 middle-, and 3 upper-income CTs.

Demographic Information of the Assessment Area						
Assessment Area: 2019 - 2022 GB MT Missoula MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	20	5.0	15.0	65.0	15.0	0.0
Population by Geography	111,966	1.9	17.6	63.0	17.5	0.0
Housing Units by Geography	51,056	2.9	18.8	62.6	15.7	0.0
Owner-Occupied Units by Geography	27,228	0.5	12.6	67.3	19.5	0.0
Occupied Rental Units by Geography	19,396	5.9	29.7	51.8	12.6	0.0
Vacant Units by Geography	4,432	4.2	9.4	80.6	5.8	0.0
Businesses by Geography	16,292	9.8	18.2	55.8	16.3	0.0
Farms by Geography	490	2.7	13.5	68.6	15.3	0.0
Family Distribution by Income Level	26,664	21.0	18.2	20.8	39.9	0.0
Household Distribution by Income Level	46,624	24.3	16.2	17.0	42.5	0.0
Median Family Income MSA - 33540 Missoula, MT MSA		\$65,463	Median Housing Value			\$239,884
			Median Gross Rent			\$774
			Families Below Poverty Level			8.7%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

The June 30, 2021 Deposit Market Share Report shows that GB ranked 1<sup>st</sup> out of 11 FDIC-insured institutions competing within the AA, with 26.7 percent of the deposit market share. According to the same data, the bank operates 8 out of 35 branches in the AA.

In 2020, GB ranked 1<sup>st</sup> out of 225 lenders and reported 1,017 originated or purchased home mortgage loans in the AA, giving the bank a market share of 10.1 percent by number of loans originated.

In 2020, the institution ranked 1<sup>st</sup> of 88 lenders and reported 1,655 small business loans in the AA, giving the bank a market share of 61.1 percent by number. During the same year, GB ranked 2<sup>nd</sup> out



of 10 lenders and reported 8 small farm loans in the AA, giving the bank a market share of 22.2 percent by number.

## Billings

The Billings AA is located on the Southern border of Montana and comprises the Billings MSA in its entirety. There were no changes to the AA since the previous evaluation. The AA consists of 1 low-, 9 moderate-, 24 middle-, and 6 upper-income CTs.

Demographic Information of the Assessment Area						
Assessment Area: 2019 - 2022 GB MT Billings MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	40	2.5	22.5	60.0	15.0	0.0
Population by Geography	173,248	2.5	19.9	59.8	17.9	0.0
Housing Units by Geography	77,082	2.1	21.5	60.6	15.8	0.0
Owner-Occupied Units by Geography	48,363	1.1	17.4	62.6	19.0	0.0
Occupied Rental Units by Geography	21,301	4.7	32.5	52.1	10.7	0.0
Vacant Units by Geography	7,418	1.7	16.6	72.0	9.7	0.0
Businesses by Geography	20,635	2.0	25.9	56.2	15.9	0.0
Farms by Geography	1,117	1.1	14.1	66.0	18.9	0.0
Family Distribution by Income Level	44,006	19.4	18.2	21.8	40.7	0.0
Household Distribution by Income Level	69,664	23.2	16.1	18.1	42.6	0.0
Median Family Income MSA - 13740 Billings, MT MSA		\$66,565	Median Housing Value			\$196,825
			Median Gross Rent			\$791
			Families Below Poverty Level			7.9%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

The June 30, 2021 Deposit Market Share Report shows that GB ranked 5<sup>th</sup> out of 12 FDIC-insured institutions competing within the AA, with 11.8 percent of the deposit market share. According to the same data, the bank operates 7 out of 12 branches in the AA.

In 2020, GB ranked 3<sup>rd</sup> out of 245 lenders and reported 26 originated or purchased home mortgage loans in the AA, giving the bank a market share of 6.4 percent by number of loans originated.

In 2020, the institution ranked 2<sup>nd</sup> out of 73 lenders and reported 817 small business loans in the AA, giving the bank a market share of 16.2 percent by number. During the same year, GB ranked 4<sup>th</sup> out of 15 lenders and reported 35 small farm loans in the AA, giving the bank a market share of 8.7 percent by number.

## Great Falls

The Great Falls AA is located in Central Montana and comprises the entirety of the Great Falls MSA. There were no changes to the AA since the previous evaluation. The AA consists of 2 middle-income CTs.

Demographic Information of the Assessment Area						
Assessment Area: 2019 - 2022 GB MT Great Falls MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2	0.0	0.0	100.0	0.0	0.0
Population by Geography	8,013	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	3,413	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	2,408	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	697	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	308	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	785	0.0	0.0	100.0	0.0	0.0
Farms by Geography	129	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	2,163	24.4	18.9	20.3	36.4	0.0
Household Distribution by Income Level	3,105	25.1	18.3	17.6	39.0	0.0
Median Family Income MSA - 24500 Great Falls, MT MSA		\$58,102	Median Housing Value			\$137,076
			Median Gross Rent			\$567
			Families Below Poverty Level			13.2%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

The June 30, 2021 Deposit Market Share Report shows that GB ranked was the only institution located in the AA. With 1 branch, GB has 100.0 percent of the area's market share.

In 2020, GB ranked 10<sup>th</sup> out of 68 lenders and reported 16 originated or purchased home mortgage loans in the AA, giving the bank a market share of 2.6 percent by number.

In 2020, the institution ranked 7<sup>th</sup> out of 60 lenders and reported 104 small business loans in the AA, giving the bank a market share of 5.5 percent by number. During the same year, GB ranked 2<sup>nd</sup> out of 11 lenders and reported 46 small farm loans in the AA, giving the bank a market share of 28.7 percent by number.

## IDAHO

### Boise City

The Boise AA consists of Ada and Canyon Counties, which are located in the Southern part of Idaho near the western border. The two counties represent a portion of the larger Boise City MSA. There were no changes to the AA since the previous evaluation. The AA includes 6 low-, 25 moderate-, 33 middle-, and 24 upper-income CTs.

Demographic Information of the Assessment Area						
Assessment Area: 2019 - 2022 GB ID Boise City MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	88	6.8	28.4	37.5	27.3	0.0
Population by Geography	616,422	3.6	26.4	44.8	25.2	0.0
Housing Units by Geography	235,712	4.2	26.7	43.8	25.3	0.0
Owner-Occupied Units by Geography	151,060	1.5	22.2	46.4	29.9	0.0
Occupied Rental Units by Geography	72,033	8.9	35.5	39.4	16.1	0.0
Vacant Units by Geography	12,619	9.5	29.8	37.6	23.2	0.0
Businesses by Geography	94,597	8.2	21.5	39.5	30.8	0.0
Farms by Geography	3,261	4.1	21.7	46.9	27.2	0.0
Family Distribution by Income Level	152,134	18.9	18.6	21.8	40.7	0.0
Household Distribution by Income Level	223,093	22.5	16.6	18.9	42.0	0.0
Median Family Income MSA - 14260 Boise City, ID MSA		\$61,722	Median Housing Value			\$174,922
			Median Gross Rent			\$843
			Families Below Poverty Level			10.0%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

The June 30, 2021 Deposit Market Share Report shows that GB ranked 9<sup>th</sup> out of 22 FDIC-insured institutions competing within the AA, with 3.4 percent of the deposit market share. According to the same data, the bank operates 8 out of 153 branches in the AA.

In 2020, GB ranked 38<sup>th</sup> out of 445 lenders and reported 621 originated or purchased home mortgage loans in the AA, giving the bank a market share of 0.6 percent by number.

In 2020, the institution ranked 7<sup>th</sup> out of 134 lenders and reported 891 small business loans in the AA, giving the bank a market share of 5.5 percent by number. During the same year, GB ranked 11<sup>th</sup> out of 20 lenders and reported 7 small farm loans in the AA, giving the bank a market share of 1.9 percent by number.

## Idaho Non-MSA

The Idaho Non-MSA AA consists of Bonner and Boundary Counties in the Northern Panhandle of Idaho, Blaine County located in Central Idaho, and Teton County, which is located on the Eastern border of the state. These counties are not a part of any larger MSA. There were no changes to the AA since the previous evaluation. The AA includes 1 moderate-, 1 middle-, and 4 upper-income CTs. There are no low-income CTs in this AA.

Demographic Information of the Assessment Area						
Assessment Area: 2019 - 2022 GB ID Non MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	16	0.0	6.3	68.8	25.0	0.0
Population by Geography	83,621	0.0	4.2	63.9	31.9	0.0
Housing Units by Geography	50,427	0.0	3.3	60.6	36.2	0.0
Owner-Occupied Units by Geography	24,129	0.0	4.3	65.8	29.9	0.0
Occupied Rental Units by Geography	9,858	0.0	3.5	61.1	35.4	0.0
Vacant Units by Geography	16,440	0.0	1.6	52.6	45.8	0.0
Businesses by Geography	12,252	0.0	2.9	67.6	29.6	0.0
Farms by Geography	610	0.0	1.8	75.1	23.1	0.0
Family Distribution by Income Level	22,234	17.2	16.7	19.7	46.4	0.0
Household Distribution by Income Level	33,987	21.8	16.7	16.5	45.0	0.0
Median Family Income Non-MSAs - ID		\$52,867	Median Housing Value			\$311,516
			Median Gross Rent			\$805
			Families Below Poverty Level			10.1%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

The June 30, 2021 Deposit Market Share Report shows that GB ranked 1<sup>st</sup> out of 14 FDIC-insured institutions competing within the AA, with 22.3 percent of the deposit market share. According to the same data, the bank operates 5 out of 35 branches in the AA.

In 2020, GB ranked 1<sup>st</sup> out of 339 lenders and reported 993 originated or purchased home mortgage loans in the AA, giving the bank a market share of 8.6 percent by number.

In 2020, the institution ranked 1<sup>st</sup> out of 74 lenders and reported 834 small business loans in the AA, giving the bank a market share of 21.3 percent by number. During the same year, GB ranked 6<sup>th</sup> out of 17 lenders and reported 9 small farm loans in the AA, giving the bank a market share of 3.6 percent by number.

## Idaho Falls-Rexburg-Blackfoot CSA

The Idaho Falls AA is located in the Eastern part of Idaho and is comprised of the Idaho Falls MSA, and the Rexburg and Blackfoot Micropolitan Statistical Areas. There were no changes to the AA since the previous evaluation. The AA includes 3 low-, 5-moderate-, 24 middle-, and 10 upper-income CTs. There are no low-income CTs in this AA.

Demographic Information of the Assessment Area						
Assessment Area: 2019 - 2022 GB ID IF Rexburg Blackfoot CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	42	7.1	11.9	57.1	23.8	0.0
Population by Geography	230,848	9.0	9.8	62.5	18.6	0.0
Housing Units by Geography	86,514	8.4	11.7	57.1	22.9	0.0
Owner-Occupied Units by Geography	52,393	2.6	8.2	66.3	22.9	0.0
Occupied Rental Units by Geography	21,875	20.1	20.5	48.1	11.4	0.0
Vacant Units by Geography	12,246	12.0	10.9	33.7	43.4	0.0
Businesses by Geography	27,022	6.2	12.5	55.5	25.8	0.0
Farms by Geography	1,601	2.3	3.7	73.1	20.9	0.0
Family Distribution by Income Level	56,394	20.7	18.3	20.3	40.8	0.0
Household Distribution by Income Level	74,268	22.3	17.3	18.8	41.6	0.0
Median Family Income MSA - 26820 Idaho Falls, ID MSA		\$57,604	Median Housing Value			\$159,767
Median Family Income Non-MSAs - ID		\$52,867	Median Gross Rent			\$687
			Families Below Poverty Level			12.6%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

The June 30, 2021 Deposit Market Share Report shows that GB ranked 8<sup>th</sup> out of 11 FDIC-insured institutions competing within the AA, with 4.1 percent of the deposit market share. According to the same data, the bank operates 3 out of 53 branches in the AA.

In 2020, GB ranked 17<sup>th</sup> out of 290 lenders and reported 379 originated or purchased home mortgage loans in the AA, giving the bank a market share of 1.6 percent by number.

In 2020, the institution ranked 6<sup>th</sup> out of 78 lenders and reported 391 small business loans in the AA, giving the bank a market share of 5.8 percent by number. During the same year, GB ranked 10<sup>th</sup> out of 18 lenders and reported 5 small farm loans in the AA, giving the bank a market share of 0.6 percent by number.

## Pocatello

The Pocatello AA is located in the Southeastern part of Idaho and includes the Pocatello MSA in its entirety. There were no changes to the AA since the previous evaluation. The AA includes 1 low-, 4 moderate-, 13 middle-, and 6 upper-income CTs.

Demographic Information of the Assessment Area						
Assessment Area: 2019 - 2022 GB ID Pocatello MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	24	4.2	16.7	54.2	25.0	0.0
Population by Geography	91,335	2.8	16.5	56.3	24.4	0.0
Housing Units by Geography	36,281	3.2	18.4	56.0	22.4	0.0
Owner-Occupied Units by Geography	22,138	1.6	14.7	53.5	30.1	0.0
Occupied Rental Units by Geography	10,819	6.6	25.6	58.4	9.4	0.0
Vacant Units by Geography	3,324	3.1	19.0	64.6	13.3	0.0
Businesses by Geography	9,325	3.8	20.6	48.8	26.8	0.0
Farms by Geography	440	1.1	10.9	65.9	22.0	0.0
Family Distribution by Income Level	22,017	20.9	19.5	20.0	39.6	0.0
Household Distribution by Income Level	32,957	23.9	15.6	18.3	42.2	0.0
Median Family Income MSA - 38540 Pocatello, ID MSA		\$55,908	Median Housing Value			\$142,143
			Median Gross Rent			\$630
			Families Below Poverty Level			12.8%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

The June 30, 2021 Deposit Market Share Report shows that GB ranked 2<sup>nd</sup> out of 10 FDIC-insured institutions competing within the AA, with 16.8 percent of the deposit market share. According to the same data, the bank operates 4 out of 22 branches in the AA.

In 2020, GB ranked 2<sup>nd</sup> out of 208 lenders and reported 558 originated or purchased home mortgage loans in the AA, giving the bank a market share of 7.0 percent by number.

In 2020, the institution ranked 1<sup>st</sup> out of 51 lenders and reported 335 small business loans in the AA, giving the bank a market share of 20.7 percent by number. During the same year, GB ranked 6<sup>th</sup> out of 12 lenders and reported 6 small farm loans in the AA, giving the bank a market share of 6.1 percent by number.

## WYOMING

### Casper

The Casper AA is located in Central Wyoming and consists of the entirety Natrona County, which forms the Casper MSA. This AA was added to the bank's delineated AAs in 2021. The AA includes 1 low-, 3 moderate-, 11 middle-, and 3 upper-income CT.

Demographic Information of the Assessment Area						
Assessment Area: 2020 - 2022 GB WY Casper MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	18	5.6	16.7	61.1	16.7	0.0
Population by Geography	80,011	5.7	11.3	68.4	14.5	0.0
Housing Units by Geography	35,316	6.6	11.2	67.5	14.7	0.0
Owner-Occupied Units by Geography	21,409	4.0	10.2	68.1	17.7	0.0
Occupied Rental Units by Geography	10,722	11.9	13.9	68.5	5.6	0.0
Vacant Units by Geography	3,185	6.4	9.1	59.9	24.6	0.0
Businesses by Geography	7,616	18.3	8.3	48.9	24.5	0.0
Farms by Geography	219	8.7	11.4	49.8	30.1	0.0
Family Distribution by Income Level	20,267	21.1	16.4	21.7	40.7	0.0
Household Distribution by Income Level	32,131	22.9	16.6	18.8	41.7	0.0
Median Family Income MSA - 16220 Casper, WY MSA		\$71,406	Median Housing Value			\$192,838
			Median Gross Rent			\$856
			Families Below Poverty Level			7.5%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

The June 30, 2021 Deposit Market Share Report shows that GB ranked 7<sup>th</sup> out of 9 FDIC-insured institutions competing within the AA, with 2.2 percent of the deposit market share. According to the same data, the bank operates 1 out of 19 branches in the AA.

In 2020, GB ranked 14<sup>th</sup> out of 168 lenders and reported 124 originated or purchased home mortgage loans in the AA, giving the bank a market share of 1.8 percent by number.

In 2020, the institution ranked 3<sup>rd</sup> of 59 lenders and reported 228 small business loans in the AA, giving the bank a market share of 2.2 percent by number. During the same year, GB ranked 3<sup>rd</sup> out of 9 lenders and reported 11 small farm loans in the AA, giving the bank a market share of 11.3 percent by number.

## COLORADO

### Denver-Aurora-Lakewood

The Denver AA is located in the Central portion of Colorado and consists of a portion of the Denver-Aurora-Lakewood MSA. There were no changes to the AA since the previous evaluation. The AA includes 51 low-, 147 moderate-, 188 middle-, 196 upper-income CTs, and 5 CTs with no income designation.

Demographic Information of the Assessment Area						
Assessment Area: 2019 - 2022 GB CO Denver Aurora Lakewood MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	587	8.7	25.0	32.0	33.4	0.9
Population by Geography	2,588,488	9.1	25.0	32.2	33.6	0.1
Housing Units by Geography	1,048,213	8.7	24.4	33.7	33.2	0.0
Owner-Occupied Units by Geography	623,986	4.8	19.4	33.7	42.1	0.0
Occupied Rental Units by Geography	372,043	14.6	32.4	33.8	19.1	0.0
Vacant Units by Geography	52,184	12.2	26.4	33.0	28.4	0.0
Businesses by Geography	490,039	7.0	19.5	31.3	41.9	0.3
Farms by Geography	8,575	8.1	20.1	30.5	41.0	0.3
Family Distribution by Income Level	627,437	21.6	17.5	20.4	40.5	0.0
Household Distribution by Income Level	996,029	23.7	16.6	18.2	41.5	0.0
Median Family Income MSA - 19740 Denver-Aurora-Lakewood, CO MSA		\$80,820	Median Housing Value			\$280,595
			Median Gross Rent			\$1,067
			Families Below Poverty Level			8.2%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

The June 30, 2021 Deposit Market Share Report shows that GB ranked 25<sup>th</sup> out of 68 FDIC-insured institutions competing within the AA, with 0.2 percent of the deposit market share. According to the same data, the bank operates 3 out of 588 branches in the AA.

In 2020, GB ranked 220<sup>th</sup> out of 1,008 lenders and reported 149 originated or purchased home mortgage loans in the AA, giving the bank a market share of .04 percent by number.

In 2020, the institution ranked 27<sup>th</sup> out of 296 lenders and reported 584 small business loans in the AA, giving the bank a market share of 0.6 percent by number. During the same year, GB ranked 18<sup>th</sup> out of 28 lenders and reported 2 small farm loans in the AA, giving the bank a market share of 0.6 percent by number.



## Pueblo

The Pueblo AA is located in the Central portion of Colorado and consists of the Pueblo MSA and the Canon City Micropolitan Statistical Areas. There were no changes to the AA since the previous evaluation. The AA includes 3 low-, 21 moderate-, 24 middle-, 15 upper-income CTs, and 6 CTs with no income designation.

Demographic Information of the Assessment Area						
Assessment Area: 2019 - 2022 GB CO Pueblo Canon City CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	69	4.3	30.4	34.8	21.7	8.7
Population by Geography	208,328	4.0	32.0	31.5	27.0	5.5
Housing Units by Geography	89,199	4.4	36.0	34.2	25.3	0.0
Owner-Occupied Units by Geography	51,953	2.7	29.4	35.1	32.8	0.0
Occupied Rental Units by Geography	27,277	7.6	48.3	31.3	12.8	0.0
Vacant Units by Geography	9,969	4.6	37.1	37.5	20.7	0.0
Businesses by Geography	19,747	2.4	32.3	32.4	32.5	0.3
Farms by Geography	834	2.0	21.2	43.3	33.3	0.1
Family Distribution by Income Level	51,300	23.4	18.7	19.2	38.7	0.0
Household Distribution by Income Level	79,230	25.0	17.2	17.7	40.2	0.0
Median Family Income MSA - 39380 Pueblo, CO MSA		\$51,986	Median Housing Value			\$137,886
Median Family Income Non-MSAs - CO		\$60,701	Median Gross Rent			\$761
			Families Below Poverty Level			14.9%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

The June 30, 2021 Deposit Market Share Report shows that GB ranked 3<sup>rd</sup> out of 17 FDIC-insured institutions competing within the AA, with 13.8 percent of the deposit market share. According to the same data, the bank operates 7 out of 49 branches in the AA.

In 2020, GB ranked 36<sup>th</sup> out of 414 lenders and reported 126 originated or purchased home mortgage loans in the AA, giving the bank a market share of 0.6 percent by number.

In 2020, the institution ranked 1<sup>st</sup> out of 93 lenders and reported 417 small business loans in the AA, giving the bank a market share of 13.3 percent by number. During the same year, GB ranked 3<sup>rd</sup> out of 13 lenders and reported 7 small farm loans in the AA, giving the bank a market share of 10.2 percent by number.

## Grand Junction

The Grand Junction AA is located on the western border of Colorado and consists of the Grand Junction MSA in its entirety. There were no changes to the AA since the previous evaluation. The AA includes 7 moderate-, 16 middle-, and 6 upper-income CTs. There are no low-income CTs in the AA.

Demographic Information of the Assessment Area						
Assessment Area: 2019 - 2022 GB CO Grand Junction MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	29	0.0	24.1	55.2	20.7	0.0
Population by Geography	147,834	0.0	24.5	56.4	19.1	0.0
Housing Units by Geography	63,472	0.0	23.8	56.9	19.4	0.0
Owner-Occupied Units by Geography	40,908	0.0	19.1	58.3	22.7	0.0
Occupied Rental Units by Geography	18,307	0.0	35.6	52.2	12.2	0.0
Vacant Units by Geography	4,257	0.0	17.9	63.5	18.7	0.0
Businesses by Geography	21,006	0.0	17.5	56.2	26.3	0.0
Farms by Geography	821	0.0	11.7	45.6	42.8	0.0
Family Distribution by Income Level	38,714	21.6	18.0	19.9	40.5	0.0
Household Distribution by Income Level	59,215	23.7	16.7	18.1	41.6	0.0
Median Family Income MSA - 24300 Grand Junction, CO MSA		\$60,676	Median Housing Value			\$212,084
			Median Gross Rent			\$885
			Families Below Poverty Level			11.4%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

The June 30, 2021 Deposit Market Share Report shows that GB ranked 9<sup>th</sup> out of 13 FDIC-insured institutions competing within the AA, with 4.3 percent of the deposit market share. According to the same data, the bank operates 3 out of 37 branches in the AA.

In 2020, GB ranked 39<sup>th</sup> out of 398 lenders and reported 109 originated or purchased home mortgage loans in the AA, giving the bank a market share of 0.5 percent by number.

In 2020, the institution ranked 5<sup>th</sup> out of 81 lenders and reported 274 small business loans in the AA, giving the bank a market share of 6.2 percent by number. During the same year, GB ranked 9<sup>th</sup> out of 16 lenders and reported 3 small farm loans in the AA, giving the bank a market share of 1.7 percent by number.

## Colorado Springs

The Colorado Springs AA is located in the Central portion of Colorado and consists of a portion of the Colorado Springs MSA. There were no changes to the AA since the previous evaluation. The AA includes 7 low-, 40 moderate-, 50 middle-, 31 upper-income CTs, and 2 CTs with no income designation.

Demographic Information of the Assessment Area						
Assessment Area: 2019 - 2022 GB CO Colorado Springs MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	130	5.4	30.8	38.5	23.8	1.5
Population by Geography	655,024	4.7	26.8	39.7	27.4	1.4
Housing Units by Geography	261,745	5.3	28.8	39.2	26.7	0.0
Owner-Occupied Units by Geography	153,354	3.3	20.7	42.2	33.8	0.0
Occupied Rental Units by Geography	91,933	8.1	41.5	35.1	15.3	0.1
Vacant Units by Geography	16,458	7.6	34.5	33.5	24.4	0.0
Businesses by Geography	96,961	6.9	23.2	34.1	35.7	0.1
Farms by Geography	2,284	6.9	20.9	42.2	30.0	0.0
Family Distribution by Income Level	168,103	20.4	18.5	20.3	40.8	0.0
Household Distribution by Income Level	245,287	22.7	16.7	19.0	41.6	0.0
Median Family Income MSA - 17820 Colorado Springs, CO MSA		\$71,351	Median Housing Value			\$224,065
			Median Gross Rent			\$987
			Families Below Poverty Level			8.4%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

The June 30, 2021 Deposit Market Share Report shows that GB ranked 30<sup>th</sup> out of 38 FDIC-insured institutions competing within the AA, with 0.4 percent of the deposit market share. According to the same data, the bank operates 1 out of 125 branches in the AA.

In 2020, GB ranked 142<sup>nd</sup> out of 683 lenders and reported 71 originated or purchased home mortgage loans in the AA, giving the bank a market share of .07 percent by number.

In 2020, the institution ranked 20<sup>th</sup> out of 165 lenders and reported 180 small business loans in the AA, giving the bank a market share of 1.1 percent by number. During the same year, GB ranked 14<sup>th</sup> out of 16 lenders and reported 1 small farm loan in the AA, giving the bank a market share of 1.3 percent by number.

## ARIZONA

### Lake Havasu City

The Lake Havasu City AA is located in the Western portion of Arizona, and borders the State of Nevada. It consists of the Lake Havasu City-Kingman MSA in its entirety. This AA was added to the bank's delineated AAs in 2020. The AA includes 7 moderate-, 28 middle-, and 8 upper-income CTs. There are no low-income CTs in the AA.

Demographic Information of the Assessment Area						
Assessment Area: 2020 - 2022 GB AZ Lake Havasu City MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	43	0.0	16.3	65.1	18.6	0.0
Population by Geography	203,362	0.0	10.3	71.9	17.7	0.0
Housing Units by Geography	111,984	0.0	10.4	70.8	18.8	0.0
Owner-Occupied Units by Geography	54,220	0.0	9.2	72.3	18.5	0.0
Occupied Rental Units by Geography	26,612	0.0	12.3	69.1	18.6	0.0
Vacant Units by Geography	31,152	0.0	10.7	69.8	19.5	0.0
Businesses by Geography	19,618	0.0	4.1	71.6	24.3	0.0
Farms by Geography	429	0.0	4.9	79.7	15.4	0.0
Family Distribution by Income Level	51,465	18.5	19.3	22.2	40.0	0.0
Household Distribution by Income Level	80,832	21.6	17.9	19.4	41.1	0.0
Median Family Income MSA - 29420 Lake Havasu City-Kingman, AZ MSA		\$46,268	Median Housing Value			\$135,042
			Median Gross Rent			\$788
			Families Below Poverty Level			13.6%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

The June 30, 2021 Deposit Market Share Report shows that GB ranked 3<sup>rd</sup> out of 11 FDIC-insured institutions competing within the AA, with 11.2 percent of the deposit market share. According to the same data, the bank operates 5 out of 36 branches in the AA.

In 2020, GB ranked 15<sup>th</sup> out of 499 lenders and reported 389 originated or purchased home mortgage loans in the AA, giving the bank a market share of 1.6 percent by number.

In 2020, the institution ranked 5<sup>th</sup> out of 85 lenders and reported 302 small business loans in the AA, giving the bank a market share of 8.0 percent by number. GB did not originate any small farm loans in the AA.

## Phoenix-Mesa-Chandler

The Phoenix AA is located in the Southern portion of Arizona and consists of the Phoenix-Mesa-Chandler MSA in its entirety. Maricopa County was included in the AA in 2020. The AA includes 110 low-, 231 moderate-, 326 middle-, 311 upper-income CTs, and 13 CTs with no income designation.

Demographic Information of the Assessment Area						
Assessment Area: 2020 - 2022 GB AZ Phoenix Mesa Chandler MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	991	11.1	23.3	32.9	31.4	1.3
Population by Geography	4,407,915	10.6	23.5	33.7	31.9	0.3
Housing Units by Geography	1,832,045	9.4	23.9	35.6	31.1	0.1
Owner-Occupied Units by Geography	967,478	4.5	19.6	37.1	38.7	0.0
Occupied Rental Units by Geography	602,639	16.7	29.7	32.6	20.8	0.2
Vacant Units by Geography	261,928	10.7	26.4	36.5	26.3	0.1
Businesses by Geography	825,132	6.9	15.5	30.9	46.2	0.5
Farms by Geography	13,842	7.0	19.6	31.4	41.7	0.3
Family Distribution by Income Level	1,036,417	21.9	17.3	19.5	41.3	0.0
Household Distribution by Income Level	1,570,117	23.4	16.5	17.9	42.2	0.0
Median Family Income MSA - 38060 Phoenix-Mesa-Chandler, AZ MSA		\$63,686	Median Housing Value			\$197,320
			Median Gross Rent			\$991
			Families Below Poverty Level			12.5%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

The June 30, 2021 Deposit Market Share Report shows that GB ranked 50<sup>th</sup> out of 58 FDIC-insured institutions competing within the AA, with .03 percent of the deposit market share. According to the same data, the bank operates 2 out of 728 branches in the AA.

In 2020, GB ranked 285<sup>th</sup> out of 1,071 lenders and reported 130 originated or purchased home mortgage loans in the AA, giving the bank a market share of .02 percent by number.

In 2020, the institution ranked 59<sup>th</sup> out of 320 lenders and reported 153 small business loans in the AA, giving the bank a market share of 0.1 percent by number. During the same year, GB ranked 8<sup>th</sup> out of 37 lenders and reported 21 small farm loans in the AA, giving the bank a market share of 3.2 percent by number.

## Yuma

The Yuma AA is located in the Southwestern part of Arizona and consists of the Yuma MSA in its entirety. There were no changes to the AA since the previous evaluation. The AA includes 15 moderate-, 25 middle-, and 12 upper-income CTs, and 3 CTs with no income designation. There are no low-income CTs in the AA.

Demographic Information of the Assessment Area						
Assessment Area: 2019 - 2022 GB AZ Yuma MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	55	0.0	27.3	45.5	21.8	5.5
Population by Geography	202,987	0.0	32.9	42.0	24.8	0.3
Housing Units by Geography	89,330	0.0	26.8	48.2	24.9	0.0
Owner-Occupied Units by Geography	48,081	0.0	25.7	47.0	27.3	0.0
Occupied Rental Units by Geography	22,558	0.0	39.5	38.2	22.3	0.0
Vacant Units by Geography	18,691	0.0	14.5	63.6	21.9	0.0
Businesses by Geography	12,332	0.0	27.8	38.7	33.5	0.0
Farms by Geography	555	0.0	21.1	48.8	30.1	0.0
Family Distribution by Income Level	54,231	20.0	19.1	19.6	41.3	0.0
Household Distribution by Income Level	70,639	22.0	17.8	18.8	41.5	0.0
Median Family Income MSA - 49740 Yuma, AZ MSA		\$44,088	Median Housing Value			\$112,634
			Median Gross Rent			\$841
			Families Below Poverty Level			17.6%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

The June 30, 2021 Deposit Market Share Report shows that GB ranked 4<sup>th</sup> out of 7 FDIC-insured institutions competing within the AA, with 13.5 percent of the deposit market share. According to the same data, the bank operates 2 out of 23 branches in the AA.

In 2020, GB ranked 51<sup>st</sup> out of 297 lenders and reported 35 originated or purchased home mortgage loans in the AA, giving the bank a market share of 0.2 percent by number.

In 2020, the institution ranked 2<sup>nd</sup> out of 76 lenders and reported 313 small business loans in the AA, giving the bank a market share of 12.1 percent by number. During the same year, GB ranked 1<sup>st</sup> out of 12 lenders and reported 28 small farm loans in the AA, giving the bank a market share of 31.1 percent by number.

## Flagstaff

The Flagstaff AA is located in the northern part of Arizona and consists of the Flagstaff MSA in its entirety. This AA was added to the bank's delineated AAs in 2019. The AA includes 1 low-, 7 moderate-, 9 middle-, 10 upper-income CTs, and 1 CT with no income designation.

Demographic Information of the Assessment Area						
Assessment Area: 2019 - 2022 GB AZ Flagstaff MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	28	3.6	25.0	32.1	35.7	3.6
Population by Geography	136,701	3.2	26.0	29.0	34.5	7.3
Housing Units by Geography	63,955	2.3	21.4	38.5	37.0	0.8
Owner-Occupied Units by Geography	27,868	3.5	18.2	35.6	42.7	0.0
Occupied Rental Units by Geography	18,751	0.8	35.2	24.3	37.0	2.7
Vacant Units by Geography	17,336	1.9	11.6	58.5	27.8	0.2
Businesses by Geography	15,938	0.1	17.7	32.3	48.6	1.4
Farms by Geography	337	0.0	13.9	29.4	56.1	0.6
Family Distribution by Income Level	29,887	24.0	15.6	17.2	43.2	0.0
Household Distribution by Income Level	46,619	25.6	15.3	17.3	41.8	0.0
Median Family Income MSA - 22380 Flagstaff, AZ MSA		\$61,083	Median Housing Value			\$233,418
			Median Gross Rent			\$1,003
			Families Below Poverty Level			15.5%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

The June 30, 2021 Deposit Market Share Report shows that GB ranked 9<sup>th</sup> out of 9 FDIC-insured institutions competing within the AA, with 1.1 percent of the deposit market share. According to the same data, the bank operates 1 out of 18 branches in the AA.

In 2020, GB ranked 65<sup>th</sup> out of 399 lenders and reported 36 originated or purchased home mortgage loans in the AA, giving the bank a market share of 0.2 percent by number.

In 2020, the institution ranked 7<sup>th</sup> out of 86 lenders and reported 214 small business loans in the AA, giving the bank a market share of 5.8 percent by number. During the same year, GB ranked 4<sup>th</sup> out of 8 lenders and reported 2 small farm loans in the AA, giving the bank a market share of 11.1 percent by number.

## Tucson

The Tucson AA is located in the southern portion of Arizona and consists of the Tucson MSA in its entirety. There were no changes to the AA since the previous evaluation. The AA includes 19 low-, 67 moderate-, 77 middle-, 76 upper-income CTs, and 2 CTs with no income designation.

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2019 - 2022 GB AZ Tucson MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	241	7.9	27.8	32.0	31.5	0.8
Population by Geography	998,537	9.1	27.1	31.2	32.1	0.5
Housing Units by Geography	446,769	8.8	27.1	31.6	32.4	0.1
Owner-Occupied Units by Geography	238,329	4.7	21.4	32.9	41.0	0.0
Occupied Rental Units by Geography	151,329	14.9	35.4	29.3	20.2	0.3
Vacant Units by Geography	57,111	10.0	28.4	32.1	29.4	0.1
Businesses by Geography	125,786	6.0	22.1	28.5	42.4	1.0
Farms by Geography	2,576	5.9	21.6	33.0	39.2	0.3
Family Distribution by Income Level	239,972	22.2	17.3	19.1	41.4	0.0
Household Distribution by Income Level	389,658	24.7	16.1	16.9	42.3	0.0
Median Family Income MSA - 46060 Tucson, AZ MSA		\$57,457	Median Housing Value			\$172,844
			Median Gross Rent			\$846
			Families Below Poverty Level			13.3%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

The June 30, 2021 Deposit Market Share Report shows that GB ranked 17<sup>th</sup> out of 20 FDIC-insured institutions competing within the AA, with 0.1 percent of the deposit market share. According to the same data, the bank operates 1 out of 150 branches in the AA.

In 2020, GB ranked 197<sup>th</sup> out of 663 lenders and reported 20 originated or purchased home mortgage loans in the AA, giving the bank a market share of .02 percent by number.

In 2020, the institution ranked 28<sup>th</sup> out of 164 lenders and reported 59 small business loans in the AA, giving the bank a market share of 0.2 percent by number. GB did not originate any small farm loans in the AA.



## WASHINGTON

### Wenatchee

The Wenatchee AA is located centrally in Washington and consists of a Wenatchee MSA in its entirety. There were no changes to the AA since the previous evaluation. The AA includes 3 moderate-, 16 middle-, and 3 upper-income CTs. There are no low-income CTs in the AA.

Demographic Information of the Assessment Area						
Assessment Area: 2019 - 2022 GB WA Wenatchee MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	22	0.0	13.6	72.7	13.6	0.0
Population by Geography	113,866	0.0	15.2	78.0	6.9	0.0
Housing Units by Geography	52,098	0.0	12.8	81.2	6.0	0.0
Owner-Occupied Units by Geography	27,968	0.0	12.3	78.4	9.3	0.0
Occupied Rental Units by Geography	13,296	0.0	20.4	76.7	2.9	0.0
Vacant Units by Geography	10,834	0.0	4.9	93.8	1.4	0.0
Businesses by Geography	10,471	0.0	19.7	70.5	9.9	0.0
Farms by Geography	874	0.0	14.1	76.3	9.6	0.0
Family Distribution by Income Level	29,146	19.1	19.1	22.3	39.6	0.0
Household Distribution by Income Level	41,264	22.6	16.8	20.0	40.6	0.0
Median Family Income MSA - 48300 Wenatchee, WA MSA		\$60,276	Median Housing Value			\$238,515
			Median Gross Rent			\$807
			Families Below Poverty Level			9.9%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

The June 30, 2021 Deposit Market Share Report shows that GB ranked 3<sup>rd</sup> out of 12 FDIC-insured institutions competing within the AA, with 7.6 percent of the deposit market share. According to the same data, the bank operates 4 out of 32 branches in the AA.

In 2020, GB ranked 13<sup>th</sup> out of 326 lenders and reported 191 originated or purchased home mortgage loans in the AA, giving the bank a market share of 1.6 percent by number.

In 2020, the institution ranked 2<sup>nd</sup> out of 59 lenders and reported 272 small business loans in the AA, giving the bank a market share of 8.7 percent by number. During the same year, GB ranked 1<sup>st</sup> out of 19 lenders and reported 83 small farm loans in the AA, giving the bank a market share of 31.8 percent by number.

## Washington Non-MSA

The Washington Non-MSA includes Okanogan County in the northern portion of the state, Pend Oreille County on the North West border, and Grant County, located in the central portion of Washington. These counties are not part of any larger MSA. There were no changes to the AA since the previous evaluation. The AA includes 1 low-, 40 moderate-, 24 middle-, and 2 upper-income CTs.

Demographic Information of the Assessment Area						
Assessment Area: 2019 - 2022 GB WA Non MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	31	3.2	12.9	77.4	6.5	0.0
Population by Geography	146,370	3.1	18.3	73.0	5.6	0.0
Housing Units by Geography	65,796	2.3	17.2	75.6	4.9	0.0
Owner-Occupied Units by Geography	33,764	1.1	15.0	76.7	7.2	0.0
Occupied Rental Units by Geography	18,609	5.6	18.7	73.3	2.5	0.0
Vacant Units by Geography	13,423	0.5	20.9	76.2	2.4	0.0
Businesses by Geography	9,401	1.6	14.5	78.5	5.4	0.0
Farms by Geography	1,286	0.5	20.4	65.8	13.4	0.0
Family Distribution by Income Level	36,847	24.0	19.7	22.1	34.2	0.0
Household Distribution by Income Level	52,373	25.3	17.3	18.3	39.0	0.0
Median Family Income Non-MSAs - WA		\$58,240	Median Housing Value			\$167,552
			Median Gross Rent			\$680
			Families Below Poverty Level			13.9%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

The June 30, 2021 Deposit Market Share Report shows that GB ranked 1<sup>st</sup> out of 13 FDIC-insured institutions competing within the AA, with 18.2 percent of the deposit market share. According to the same data, the bank operates 7 out of 36 branches in the AA.

In 2020, GB ranked 27<sup>th</sup> out of 312 lenders and reported 106 originated or purchased home mortgage loans in the AA, giving the bank a market share of 1.0 percent by number.

In 2020, the institution ranked 2<sup>nd</sup> out of 62 lenders and reported 303 small business loans in the AA, giving the bank a market share of 11.5 percent by number. During the same year, GB ranked 3<sup>rd</sup> out of 20 lenders and reported 66 small farm loans in the AA, giving the bank a market share of 11.6 percent by number.

## UTAH

### Salt Lake City-Provo-Orem CSA

The Salt Lake AA is located in the northern portion of Utah and consists of portions of the Salt Lake City and Provo-Orem MSAs and Summit County, which is not part of any larger MSA. These three areas together form the Salt Lake City-Provo-Orem CSA. This AA expanded since the prior evaluation with the addition of Salt Lake County in 2019 and Utah County in 2022. The AA includes 7 low-, 51 moderate-, 90 middle-, 73 upper-income CTs, and 4 CTs with no income designation.

Demographic Information of the Assessment Area						
Assessment Area: 2020 - 2021 GB UT SLC Provo Orem CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	225	3.1	22.7	40.0	32.4	1.8
Population by Geography	1,117,479	3.1	22.0	42.7	31.3	0.9
Housing Units by Geography	400,073	2.9	22.7	41.1	32.2	1.2
Owner-Occupied Units by Geography	243,480	1.4	16.8	44.3	37.0	0.5
Occupied Rental Units by Geography	122,339	6.2	35.8	39.0	17.8	1.2
Vacant Units by Geography	34,254	1.4	17.8	25.7	49.5	5.7
Businesses by Geography	138,209	2.6	19.4	37.5	39.7	0.8
Farms by Geography	2,260	2.3	17.2	41.2	39.0	0.4
Family Distribution by Income Level	258,080	19.5	17.3	21.7	41.4	0.0
Household Distribution by Income Level	365,819	21.9	16.3	20.2	41.5	0.0
Median Family Income MSA - 41620 Salt Lake City, UT MSA		\$71,849	Median Housing Value			\$267,431
Median Family Income Non-MSAs - UT		\$64,772	Median Gross Rent			\$980
			Families Below Poverty Level			9.1%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

The June 30, 2021 Deposit Market Share Report shows that GB ranked 40<sup>th</sup> out of 50 FDIC-insured institutions competing within the AA, with .02 percent of the deposit market share. According to the same data, the bank operates 2 out of 297 branches in the AA.

In 2020, GB ranked 43<sup>rd</sup> out of 328 lenders and reported 40 originated or purchased home mortgage loans in the AA, giving the bank a market share of 0.4 percent by number.

In 2020, the institution ranked 19<sup>th</sup> out of 190 lenders and reported 251 small business loans in the AA, giving the bank a market share of 0.7 percent by number. During the same year, GB ranked 7<sup>th</sup>

out of 13 lenders and reported 6 small farm loans in the AA, giving the bank a market share of 6.1 percent by number.

## 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.

**American Community Survey (ACS):** A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five year estimates based on population thresholds.

**Area Median Income:** The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

**Assessment Area:** A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

**Census Tract:** A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

**Combined Statistical Area (CSA):** A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

**Community Development:** For loans, investments, and services to qualify as community development activities, their primary purpose must:

- (1) Support affordable housing for low- and moderate-income individuals;
- (2) Target community services toward low- and moderate-income individuals;
- (3) Promote economic development by financing small businesses or farms; or
- (4) Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies.

**Community Development Corporation (CDC):** A CDC allows banks and holding companies to make equity type of investments in community development projects. Bank CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Bank CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization.

**Community Development Financial Institutions (CDFIs):** CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

**Community Development Loan:** A loan that:

- (1) Has as its primary purpose community development; and
- (2) Except in the case of a wholesale or limited purpose bank:
  - (i) Has not been reported or collected by the bank or an affiliate for consideration in the bank's assessment area as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and
  - (ii) Benefits the bank's assessment area(s) or a broader statewide or regional area including the bank's assessment area(s).

**Community Development Service:** A service that:

- (1) Has as its primary purpose community development;
- (2) Is related to the provision of financial services; and
- (3) Has not been considered in the evaluation of the bank's retail banking services under § 345.24(d).

**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.

**Core Based Statistical Area (CBSA):** The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

**Distressed Middle-Income Nonmetropolitan Geographies:** A nonmetropolitan middle-income 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 non-relatives living with the family. Families are classified by type as either a married-couple family or other family. Other family 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).

**FFIEC-Estimated Income Data:** The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

**Full-Scope Review:** A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower profile, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

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

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that 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 the income of applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

**Home Mortgage Loans:** Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

**Housing Unit:** Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

**Limited-Scope Review:** A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area.

Performance under applicable tests is often analyzed using only quantitative factors (for example, geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

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

**Low Income Housing Tax Credit:** The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

**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 Income:** The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

**Metropolitan Division (MD):** A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area (MSA):** CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

**Micropolitan Statistical Area:** CBSA associated with at least one urbanized area having a population of at least 10,000, but less than 50,000.

**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 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 and less than 80 percent in the case of a geography.

**Multi-family:** Refers to a residential structure that contains five or more units.

**Nonmetropolitan Area (also known as non-MSA):** All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

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

**Qualified Investment:** A 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.

**Rural Area:** Territories, populations, and housing units that are not classified as urban.

**Small Business Investment Company (SBIC):** SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms. Because money for venture or risk investments is difficult for small firms to obtain, SBA provides assistance to SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

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

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

**Underserved Middle-Income Nonmetropolitan Geographies:** A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating 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.

**Urban Area:** All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, “urban” consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

“Urban” excludes the rural portions of “extended cities”; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.