

# **PUBLIC DISCLOSURE**

February 6, 2023

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

West Plains Bank and Trust Company  
Certificate Number: 15489

11 Court Square  
West Plains, Missouri 65775

Federal Deposit Insurance Corporation  
Division of Depositor and Consumer Protection  
Kansas City Regional Office

1100 Walnut St, Suite 2100  
Kansas City, Missouri 64106

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.

**The Lending Test is Satisfactory.**

- The loan-to-deposit ratio is reasonable given the institution's size, financial condition, and assessment area credit needs.
- A majority of small business, small farm, and home mortgage loans were made in the institution's assessment area.
- The geographic distribution of loans reflects reasonable dispersion throughout the assessment area.
- The distribution of borrowers reflects excellent penetration among businesses and farms of different revenue sizes and individuals of different income levels in the assessment area.
- The institution did not receive any CRA-related complaints since the previous CRA evaluation performed as of February 10, 2020.

**The Community Development Test is rated Satisfactory.**

- The institution demonstrated adequate responsiveness to the community development needs of its assessment area through community development loans, qualified investments, and community development services considering the institution's capacity and the need and availability of such opportunities in the assessment area

## DESCRIPTION OF INSTITUTION

West Plains Bank and Trust Company is a full-service community bank headquartered in West Plains, Missouri, and is owned by West Plains Bancshares, Inc., in West Plains, Missouri. West Plains Bank and Trust Company does not have any lending subsidiaries or affiliates. The institution received a Satisfactory rating at the February 10, 2020, FDIC CRA Performance Evaluation, based on Interagency Intermediate Small Institution Examination Procedures.

In addition to its main office in West Plains, Missouri, the institution operates six additional offices in West Plains (three), Mountain View, Willow Springs, and Houston. Two of the West Plains branches (Bradford and Broadway) are limited-service branches. In addition, the bank operates one loan production office (LPO) in Mountain Home, Arkansas. Since the prior evaluation, the bank opened a branch in Houston, Missouri (located in a middle-income census tract). The institution has not closed any branches, and no merger or acquisition activities have occurred since the prior

evaluation. The bank maintains an ATM at each office, with the exception of the LPO in Mountain Home. In addition, the bank operates two independent ATMs located in West Plains and Alton, Missouri.

West Plains Bank and Trust Company offers commercial, agricultural, home mortgage, and consumer loans. Home loan products include adjustable rate loans, home equity lines of credit, construction loans, mobile home loans, and secondary market loans. Deposit products include checking and savings accounts, money market accounts, and certificates of deposit. Alternative banking products and services include debit cards, internet banking, mobile banking, mobile deposits, electronic bill pay, and the ability to apply for a loan online.

According to the Consolidated Reports of Condition and Income (Call Report) as of September 30, 2022, assets equaled approximately \$598.5 million, and included total loans and total securities of \$374.3 million and \$180.5 million, respectively. Total deposits equaled \$556.8 million. These figures represent an increase from the prior evaluation when total assets equaled \$541.0 million, total loans equaled \$322.7 million, and total deposits equaled \$489.2 million.

As illustrated in the following table, the loan portfolio is primarily composed of commercial lending at 45.8 percent, followed by agricultural lending at 23.4 percent, and home mortgage lending at 15.0 percent. This is consistent with the loan portfolio distribution at the prior evaluation, as well as the bank's primary business focus.

<b>Loan Portfolio Distribution as of 09/30/22</b>		
<b>Loan Category</b>	<b>\$(000s)</b>	<b>%</b>
Construction and Land Development	40,309	10.8
Secured by Farmland	52,031	13.9
1-4 Family Residential	51,451	13.7
Multi-family (5 or more) Residential	4,799	1.3
Commercial Real Estate	121,650	32.5
<b>Total Real Estate Loans</b>	<b>270,240</b>	<b>72.2</b>
Commercial and Industrial	49,614	13.3
Agricultural	35,476	9.5
Consumer	18,467	4.9
Obligations of States and Political Subdivisions in the U.S	0	0.0
Other	494	0.1
Less: Unearned Income	0	0.0
<b>Total Loans</b>	<b>374,291</b>	<b>100.0</b>
<i>Source: Reports of Condition and Income</i>		

Examiners did not identify any financial, legal, or other impediments affecting the bank's ability to meet the assessment area's credit needs.

## DESCRIPTION OF ASSESSMENT AREA

The CRA regulation requires financial institutions to define one or more assessment areas within which its CRA performance will be evaluated. West Plains Bank and Trust Company has designated one assessment area consisting of Howell and Texas counties in southwest Missouri. The boundaries of the assessment area have changed since the prior evaluation, with the addition of Texas County.

### **Economic and Demographic Data**

The following table illustrates select demographic characteristics of the assessment area.

Demographic Information of the Assessment Area					
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #
Geographies (Census Tracts)	12	0.0	25.0	75.0	0.0
Population by Geography	66,061	0.0	23.6	76.4	0.0
Housing Units by Geography	29,663	0.0	24.8	75.2	0.0
Owner-Occupied Units by Geography	17,724	0.0	20.7	79.3	0.0
Occupied Rental Units by Geography	7,673	0.0	35.7	64.3	0.0
Vacant Units by Geography	4,266	0.0	22.1	77.9	0.0
Businesses by Geography	4,334	0.0	23.7	76.3	0.0
Farms by Geography	315	0.0	18.7	81.3	0.0
Family Distribution by Income Level	16,963	25.4	18.2	21.1	35.3
Household Distribution by Income Level	25,397	29.8	16.4	17.1	36.7
Median Family Income Non-MSAs - MO		\$48,341	Median Housing Value		\$101,376
Families Below Poverty Level		17.2%	Median Gross Rent		\$547
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0%					

The 2021 FFIEC-updated median family income ranges are used to analyze home mortgage lending under the Borrower Profile criterion. The income categories for the non-metropolitan areas of Missouri are presented in the following table.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
2021 (\$55,700)	<\$27,850	\$27,850 to <\$44,560	\$44,560 to <\$66,840	≥\$66,840
Source: FFIEC				

### **Competition**

The bank operates in a competitive market for credit products and financial services. According to FDIC Deposit Market Share data as of June 30, 2022, there were 15 financial institutions operating 30 locations within the assessment area. These institutions range from small community banks to

large regional and national financial institutions operating in the area. West Plains Bank and Trust Company is ranked first with 33.0 percent of the deposit market share.

The institution is not required to collect or report its small business and small farm loan data. However, aggregate lending data indicates the level of demand in the assessment area for different loan products and reflects the degree of competition for these products. The 2020 small business and farm aggregate lending data shows 59 institutions reported 1,145 small business loans and 13 institutions reported 522 small farm loans in the assessment area, which indicates a relatively high level of competition for these products.

The institution is not required to report its home mortgage loan data. However, aggregate lending data is an indicator of loan demand and competition for home mortgage loans in the assessment area. The 2021 home mortgage aggregate lending data shows 149 institutions reported 1,720 home mortgage loans in the assessment area. This level of home mortgage lending activity indicates a high level of demand and competition for this product.

### **Community Contact**

Examiners conduct community contact interviews to maintain a profile of the local community, identify credit needs and opportunities, and evaluate local financial institutions' responsiveness to those needs.

Examiners reviewed a recent community contact interview that was conducted with an individual who is familiar with the bank's assessment area. The contact stated that local businesses are having difficulties retaining employees, especially the smaller businesses. The contact noted that this has led several local restaurants to close. The contact indicated that there are many older rental homes in the area, with many of these homes in disrepair. However, a local contractor has built several new homes, and the homes sell as soon as construction is complete. According to the contact, there are plans to build more homes in the area. Finally, the contact stated local financial institutions are meeting the credit needs of the local community, and individuals and businesses are able to obtain financing.

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

Considering economic and demographic data, information from bank management, and comments from the community contact, primary credit needs in the assessment area include small business, agricultural, and home mortgage loans. Community development needs include additional affordable housing units and revitalization and stabilization initiatives, as the assessment area has middle-income census tracts that are distressed or underserved.

## **SCOPE OF EVALUATION**

### **General Information**

This evaluation covers the period from the previous evaluation dated February 10, 2020, through February 6, 2023. Examiners used the FFIEC Interagency Intermediate Small Institution Examination Procedures to evaluate West Plains Bank and Trust Company's CRA performance, which includes the Lending and Community Development tests. Please refer to the Intermediate

Small Bank Performance Criteria section of the Appendices for a summary of the criterion evaluated under these tests.

### **Activities Reviewed**

Examiners reviewed small business, small farm, and home mortgage loans to evaluate the institution's lending performance. These loan types are the primary business focus of the institution and constitute the largest portions of the bank's loan portfolio and lending activity since the previous evaluation.

Management indicated that a review of loans originated in 2021 would be reflective of lending since the prior evaluation. As such, examiners analyzed small business, small farm, and home mortgage loans originated in 2021 to evaluate lending performance. Examiners did not evaluate lending activity in 2022 due to the timing of this evaluation and the availability of data. Examiners compared small business and small farm lending performance to 2021 D&B data and home mortgage lending to 2015 American Community Survey (ACS) data.

For the Lending Test, examiners reviewed the entire universe of loans to evaluate the Assessment Area Concentration criterion. Regarding the Geographic Distribution analysis, examiners focused on all loans made within the assessment area. For the Borrower Profile analysis, examiners evaluated lending performance based on a sample of small business, small farm, and home mortgage loans made within the assessment area in 2021. The following table provides details on the loans reviewed.

Loan Category	Assessment Area Concentration		Geographic Distribution		Borrower Profile	
	#	\$(000's)	#	\$(000's)	#	\$(000's)
Small Business	1,293	58,710	915	41,526	65	3,019
Small Farm	307	24,829	209	14,630	60	2,845
Home Mortgage	398	64,766	282	43,618	60	8,859
<i>Source: Bank Data</i>						

Examiners considered the number and dollar volume of loans originated during the evaluation period, Call Report data, and management's business strategy in determining the weighting applied to the loan categories reviewed. Given the concentration in small business lending, greater weight is placed on the results of the small business lending analysis.

Examiners analyzed lending performance by both the number and dollar volume of loans. However, the performance by number of loans for the Geographic Distribution and Borrower Profile analyses was emphasized, as it is generally a better indicator of the number of individuals, farms, and businesses served.

For the Community Development Test, examiners reviewed data and records provided by bank management for community development loans, qualified investments and donations, and community development services since the prior CRA evaluation. Loans considered under the Community Development Test were excluded from the Lending Test.

## CONCLUSIONS ON PERFORMANCE CRITERIA

### LENDING TEST

The bank demonstrated satisfactory performance under the Lending Test. The bank's performance under all of the Lending Test criteria support this conclusion.

#### Loan-to-Deposit Ratio

The bank's loan-to-deposit ratio is reasonable given the institution's size, financial condition, and assessment area credit needs. West Plains Bank and Trust Company's net loan-to-deposit ratio, calculated from Call Report data, averaged 66.4 percent over the past 11 calendar quarters from March 31, 2020, to September 30, 2022. The ratio ranged from a low of 57.3 percent as of September 30, 2021, to a high of 89.2 percent as of March 31, 2021.

The performance of comparable financial institutions serves as an additional method of assessing the adequacy of an institution's average net loan-to-deposit ratio. Examiners selected the comparable institutions based on their asset size, geographic location, and lending focus. As shown in the following table, the bank's average net loan-to-deposit ratio compares reasonably to the comparable institutions.

Loan-to-Deposit Ratio Comparison		
Bank	Total Assets as of 09/30/22 (\$000s)	Average Net Loan- to-Deposit Ratio (%)
West Plains Bank and Trust Company, West Plains, Missouri	598,506	66.4
Century Bank of the Ozarks, Gainesville, Missouri	242,126	84.6
Community Bank of the Ozarks, West Plains, Missouri	254,254	70.2
<i>Source: Reports of Condition and Income 3/31/2020 through 9/30/2022</i>		

#### Assessment Area Concentration

As shown in the following table, the bank originated a majority of small business, small farm, and home mortgage loans within the assessment area. The bank's lending performance reflects a commitment to meeting the assessment area's credit needs.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total	Dollar Amount of Loans \$(000s)				Total
	Inside		Outside			Inside		Outside		
	#	%	#	%	#	\$	%	\$	%	\$(000s)
Small Business	915	70.8	378	29.2	1,293	41,526	70.7	17,184	29.3	58,710
Small Farm	209	68.1	98	31.9	307	14,630	58.9	10,199	41.1	24,829
Home Mortgage	282	70.9	116	29.1	398	43,618	67.3	21,148	32.7	64,766
Source: Bank Data										
Due to rounding, totals may not equal 100.0%										



### **Geographic Distribution**

Overall, the geographic distribution of loans reflects reasonable dispersion throughout the assessment area, which is supported by the reasonable dispersion of small business, small farm, and home mortgage loans. Examiners focused on the percentages by number of loans in the moderate-income census tracts within the assessment area, as the assessment does not contain any low-income census tracts.

#### ***Small Business Loans***

The geographic distribution of small business loans reflects reasonable dispersion throughout the bank's assessment area. As reflected in the following table, small business lending in moderate-income census tracts is below comparable demographic data. However, there is a high level of competition for these loans. Further, examiners conducted a preliminary analysis of the bank's small business lending in 2022. This analysis revealed a notable increase in the volume of small business loans originated in moderate-income census tracts. Given the level of competition and the increasing lending trend in moderate-income census tracts, the bank's performance is reasonable.

<b>Geographic Distribution of Small Business Loans</b>					
<b>Tract Income Level</b>	<b>% of Businesses</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	0.0	0	0.0	0	0.0
Moderate	23.7	114	12.5	4,110	9.9
Middle	76.3	801	87.5	37,416	90.1
Upper	0.0	0	0.0	0	0.0
<b>Total</b>	<b>100.0</b>	<b>915</b>	<b>100.0</b>	<b>41,526</b>	<b>100.0</b>
<i>Source: 2021 D&amp;B Data; Bank Data Due to rounding, totals may not equal 100.0%</i>					

#### ***Small Farm Loans***

The geographic distribution of small farm loans reflects reasonable distribution throughout the bank's assessment area. As reflected in the following table, small farm lending in moderate-income census tracts is below comparable demographic data. Therefore, examiners conducted a preliminary analysis of the bank's small farm lending in 2022. This analysis revealed a notable increase in the volume of small farm loans originated in moderate-income census tracts. Given this increasing trend, the bank's performance is reasonable.

<b>Geographic Distribution of Small Farm Loans</b>					
<b>Tract Income Level</b>	<b>% of Farms</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	0.0	0	0.0	0	0.0
Moderate	18.7	19	9.1	1,184	8.1
Middle	81.3	190	90.9	13,446	91.9
Upper	0.0	0	0.0	0	0.0
<b>Total</b>	<b>100.0</b>	<b>209</b>	<b>100.0</b>	<b>14,630</b>	<b>100.0</b>
<i>Source: 2021 D&amp;B Data; Bank Data Due to rounding, totals may not equal 100.0%</i>					

### ***Home Mortgage Loans***

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout the assessment area. The following table shows that the bank's lending performance in moderate-income census tracts was less than demographic lending data. However, the bank's performance is reasonable, given the high level of competition for these loans.

<b>Geographic Distribution of Home Mortgage Loans</b>					
<b>Tract Income Level</b>	<b>% of Owner-Occupied Housing Units</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	0.0	0	0.0	0	0.0
Moderate	20.7	34	12.1	4,698	10.8
Middle	79.3	248	87.9	38,920	89.2
Upper	0.0	0	0.0	0	0.0
<b>Total</b>	<b>100.0</b>	<b>282</b>	<b>100.0</b>	<b>43,618</b>	<b>100.0</b>
<i>Source: 2015 ACS Data; Bank Data Due to rounding, totals may not equal 100.0%</i>					

### **Borrower Profile**

Overall, the distribution of borrowers reflects excellent penetration among businesses and farms of different revenue sizes and individuals of different income levels in the assessment area. The bank's excellent small business and small farm lending performance and reasonable home mortgage lending performance supports this conclusion. Examiners focused on the dispersion of small business and small farm loans to entities with gross annual revenues of \$1 million or less and home mortgage loans to low- and moderate-income individuals.

### ***Small Business Loans***

As reflected in the following table, the percentage of loans originated to businesses with gross annual revenues of \$1 million or less is significantly greater than demographic data, which reflects excellent dispersion.

<b>Distribution of Small Business Loans by Gross Annual Revenue Category</b>					
<b>Gross Revenue Level</b>	<b>% of Businesses</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<=\$1,000,000	81.8	64	98.5	2,334	77.3
>1,000,000	4.9	1	1.5	685	22.7
Revenue Not Available	13.3	0	0.0	0	0.0
<b>Total</b>	<b>100.0</b>	<b>65</b>	<b>100.0</b>	<b>3,019</b>	<b>100.0</b>
<i>Source: 2021 D&amp;B Data, Bank Data. Due to rounding, totals may not equal 100.0</i>					

### ***Small Farm Loans***

As reflected in the following table, all sampled small farm loans were to farms with gross annual revenues of \$1 million or less, which reflects excellent dispersion.

Distribution of Small Farm Loans by Gross Annual Revenue Category					
Gross Revenue Level	% of Farms	#	%	\$(000s)	%
<=\$1,000,000	99.4	60	100.0	2,845	100.0
>1,000,000	0.3	0	0.0	0	0.0
Revenue Not Available	0.3	0	0.0	0	0.0
<b>Total</b>	<b>100.0</b>	<b>60</b>	<b>100.0</b>	<b>2,845</b>	<b>100.0</b>
Source: 2021 D&B Data, Bank Data. Due to rounding, totals may not equal 100.0					

### ***Home Mortgage Loans***

The distribution of home mortgage loans reflects reasonable penetration among individuals of different income levels, including low- and moderate-income borrowers. While the bank's percentage of loans to low-income individuals is significantly less than the percentage of low-income families, the lending percentage to moderate-income borrowers is greater than demographic data. Examiners considered certain limitations when evaluating the bank's performance. According to FFIEC data, the maximum income of a low-income family in the bank's assessment area was \$27,850 in 2021. A family at this income level may have difficulty qualifying for a home mortgage under conventional underwriting standards. Further, 2015 ACS data reveals that 17.2 percent of families in the assessment area are living below the poverty level. Considering these factors, the bank's lending percentage to low-income borrowers reflects a reasonable penetration.

Distribution of Home Mortgage Loans by Borrower Income Level					
Borrower Income Level	% of Families	#	%	\$(000s)	%
Low	25.4	3	5.0	216	2.5
Moderate	18.2	14	23.3	1,614	18.2
Middle	21.1	13	21.7	1,491	16.8
Upper	35.3	30	50.0	5,538	62.5
<b>Total</b>	<b>100.0</b>	<b>60</b>	<b>100.0</b>	<b>8,859</b>	<b>100.0</b>
Source: 2015 ACS Census; Bank Data Due to rounding, totals may not equal 100.0					

### **Response to Complaints**

The institution has not received any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the Lending Test rating.

## **COMMUNITY DEVELOPMENT TEST**

West Plains Bank and Trust Company's community development performance demonstrates adequate responsiveness to the community development needs of its assessment area through community development loans, qualified investments, and community development services, considering the institution's capacity and the need and availability of such opportunities for community development in the institution's assessment area.

Examiners compared the level of community development activity to four financial institutions operating in Missouri. These comparable institutions were also evaluated using Interagency Intermediate Small Institution Examination Procedures and were selected based on asset size and market presence.

### **Community Development Loans**

West Plains Bank and Trust Company originated or renewed 68 community development loans totaling \$86.6 million during the evaluation period. This level of community development lending represented 14.5 percent of total assets and 23.4 percent of net loans as of September 30, 2022. The bank's volume of community development lending exceeds the volume of the comparable institutions' community development lending; however, the bank's community development lending ratios are similar to the comparable institutions' ratios. Comparable institutions originated or renewed community development loans ranging from \$34.6 million to \$72.1 million. The comparable institutions' community development loans ranged from 3.6 percent to 14.6 percent of total assets and 7.3 percent to 20.1 percent of net loans.

Since the bank was responsive to the community development needs of its assessment area, examiners also considered community development activities benefitting the statewide/regional area in the analysis. The following tables illustrate the community development lending activity by category, assessment area, and activity year.

<b>Community Development Lending by Assessment Area</b>										
<b>Assessment 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>
West Plains	9	9,715	2	3,401	28	41,068	12	10,780	<b>51</b>	<b>64,964</b>
Statewide/ Regional	0	0	0	0	17	21,670	0	0	<b>17</b>	<b>21,670</b>
<b>Total</b>	<b>9</b>	<b>9,715</b>	<b>2</b>	<b>3,401</b>	<b>45</b>	<b>62,738</b>	<b>12</b>	<b>10,780</b>	<b>68</b>	<b>86,634</b>
<i>Source: Bank Records</i>										

<b>Community Development Lending by Activity Year</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>
2020 (partial)	4	8,016	1	1,400	13	18,246	3	2,712	<b>21</b>	<b>30,374</b>
2021	1	67	0	0	22	26,016	6	4,881	<b>29</b>	<b>30,964</b>
2022	4	1,632	1	2,001	10	18,476	3	3,187	<b>18</b>	<b>25,296</b>
2023 (partial)	0	0	0	0	0	0	0	0	<b>0</b>	<b>0</b>
<b>Total</b>	<b>9</b>	<b>9,715</b>	<b>2</b>	<b>3,401</b>	<b>45</b>	<b>62,738</b>	<b>12</b>	<b>10,780</b>	<b>68</b>	<b>86,634</b>
<i>Source: Bank Records</i>										

The following points summarize notable examples of the bank's community development lending during the evaluation period.

- In 2020, the bank made a \$7.3 million affordable housing loan to an entity for apartments targeted to low- and moderate-income individuals.
- In 2021, the bank made a \$1.3 million loan to a business to convert a building into a factory, which helped support job creation and retention for low- and moderate-income individuals.

### **Qualified Investments**

West Plains Bank and Trust Company's 18 qualified investments totaled approximately \$7.4 million. In addition, the bank made 103 donations totaling \$518,000. Collectively, this activity represents 1.3 percent of total assets and 4.4 percent of total securities. The bank's qualified investment activity is within the range of the comparable institutions' activities. These institutions' ratios of qualified investments to total assets ranged from 0.3 percent to 2.2 percent, and qualified investments to total securities ranged from 4.5 percent to 12.4 percent.

The following tables summarize the qualified investments and donations activity by category, assessment area, and activity year.

<b>Community Development Investments by Assessment Area</b>										
<b>Assessment 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>
West Plains	0	0	104	3,984	2	4	15	3,946	121	7,934
Statewide/ Regional	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>104</b>	<b>3,984</b>	<b>2</b>	<b>4</b>	<b>15</b>	<b>3,946</b>	<b>121</b>	<b>7,934</b>
<i>Source: Bank Records</i>										

<b>Community Development Investments by Activity Year</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	0	0	4	675	0	0	0	0	4	675
2020 (partial)	0	0	1	221	0	0	4	2,005	5	2,226
2021	0	0	4	1,800	0	0	1	1,935	5	3,735
2022	0	0	4	780	0	0	0	0	4	780
2023 (partial)	0	0	0	0	0	0	0	0	0	0
<b>Subtotal</b>	<b>0</b>	<b>0</b>	<b>13</b>	<b>3,476</b>	<b>0</b>	<b>0</b>	<b>5</b>	<b>3,940</b>	<b>18</b>	<b>7,416</b>
Qualified Grants & Donations	0	0	91	508	2	4	10	6	103	518
<b>Total</b>	<b>0</b>	<b>0</b>	<b>104</b>	<b>3,984</b>	<b>2</b>	<b>4</b>	<b>15</b>	<b>3,946</b>	<b>121</b>	<b>7,934</b>
<i>Source: Bank Records</i>										

The following points summarize notable examples of the bank's qualified investments during the evaluation period.

- In 2021, the bank made a \$1.9 million investment to improve a water storage system in a distressed census tract within the assessment area.
- In 2021, the bank made four investments totaling approximately \$2.0 million to make sewer system improvements in distressed census tracts within the assessment area.

### **Community Development Services**

The bank received consideration for 131 community development services that primarily consisted of bank employees providing financial expertise to community development-related organizations within the assessment area. The bank's community development service activity exceeds the activity level of comparable institutions. These institutions received consideration for community development service activities ranging from 38 to 128. The bank is commended for its efforts. The following table illustrates the bank's community development services by category and activity year.

<b>Community Development Services by Activity Year</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>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
2020(partial)	3	17	10	2	<b>32</b>
2021	3	30	10	2	<b>45</b>
2022	3	39	10	2	<b>54</b>
2023 (partial)	0	0	0	0	<b>0</b>
<b>Total</b>	<b>9</b>	<b>86</b>	<b>30</b>	<b>6</b>	<b>131</b>
<i>Source: Bank Records</i>					

The following points summarize notable examples of community development services during the evaluation period.

- In 2021, multiple employees provided financial education to multiple school districts throughout the assessment area, where the majority of the students were eligible for free or reduced-price lunches.
- In 2021, a bank employee served on the Board of an entity that promotes economic development in the assessment area.

In addition to community development services, the bank offers a variety of retail products and services. These product and service offerings are responsive to the needs of deposit and loan customers, including low- and moderate-income individuals and small business customers. The bank offered Small Business Administration Paycheck Protection Program loans to accommodate small businesses impacted by the COVID-19 pandemic. Further, management operates two full-service branches and ATMs in moderate-income census tracts.

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

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

## **APPENDICES**

### **INTERMEDIATE SMALL 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) by considering the following criteria:

- 1) The bank's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
- 2) The percentage of loans, and as appropriate, other lending-related activities located in the bank's assessment area(s);
- 3) The geographic distribution of the bank's loans;
- 4) The bank's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
- 5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

#### **Community Development Test**

The Community Development Test considers the following criteria:

- 1) The number and amount of community development loans;
- 2) The number and amount of qualified investments;
- 3) The extent to which the bank provides community development services; and
- 4) The bank's responsiveness through such activities to community development lending, investment, and service needs.



## 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. Institution CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Institution 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 institution:
  - (i) Has not been reported or collected by the institution or an affiliate for consideration in the institution'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 institution's assessment area(s) or a broader statewide or regional area including the institution'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 institution'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 (e.g, geographic distribution, borrower profile, and total number and dollar amount of investments), and qualitative factors (e.g, innovativeness, complexity, and responsiveness).

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

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that 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 (e.g, 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.

**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.

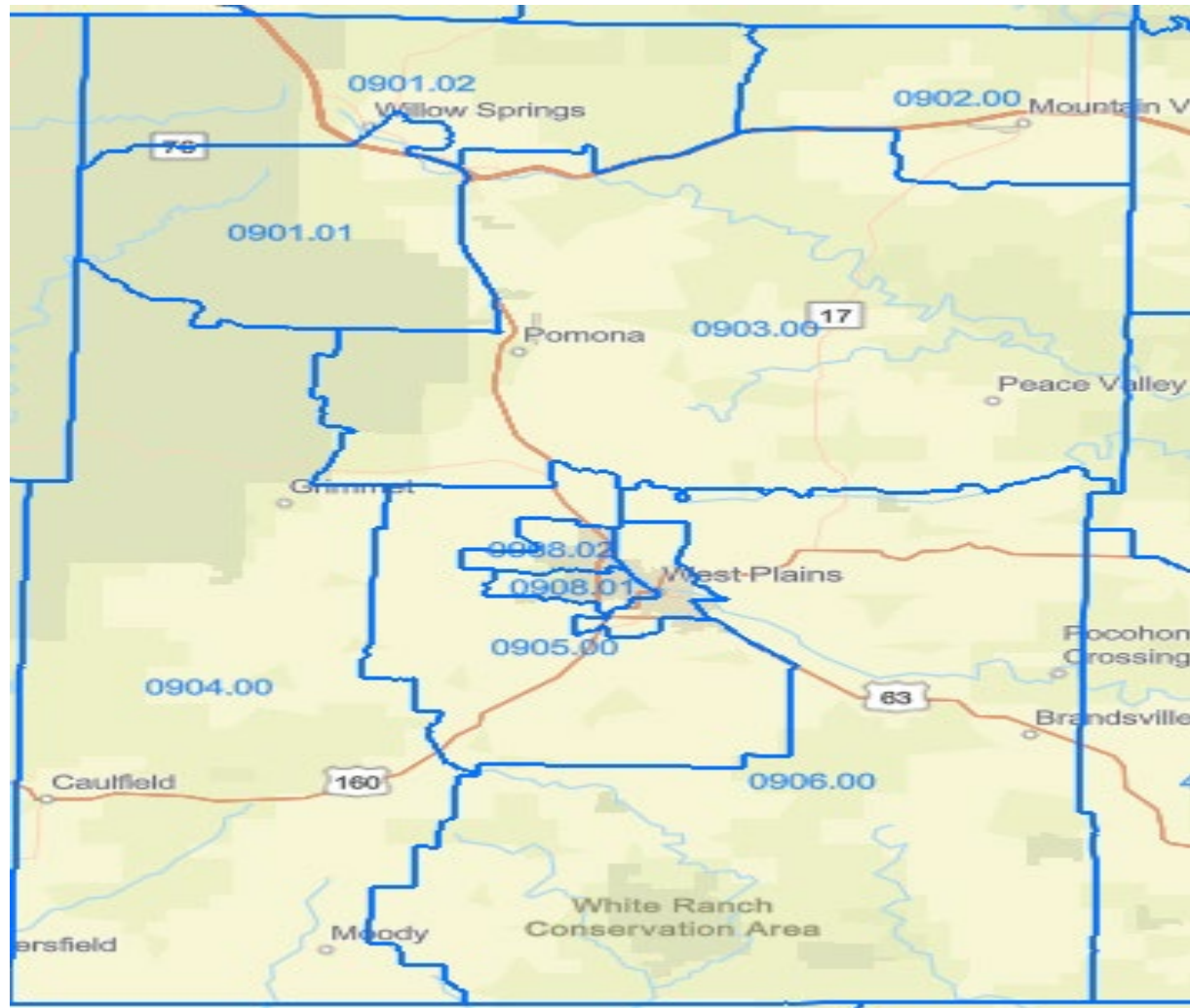
**Underserved Middle-Income Nonmetropolitan Geographies:** A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating the area's population is sufficiently small, thin, and distant from a population center that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

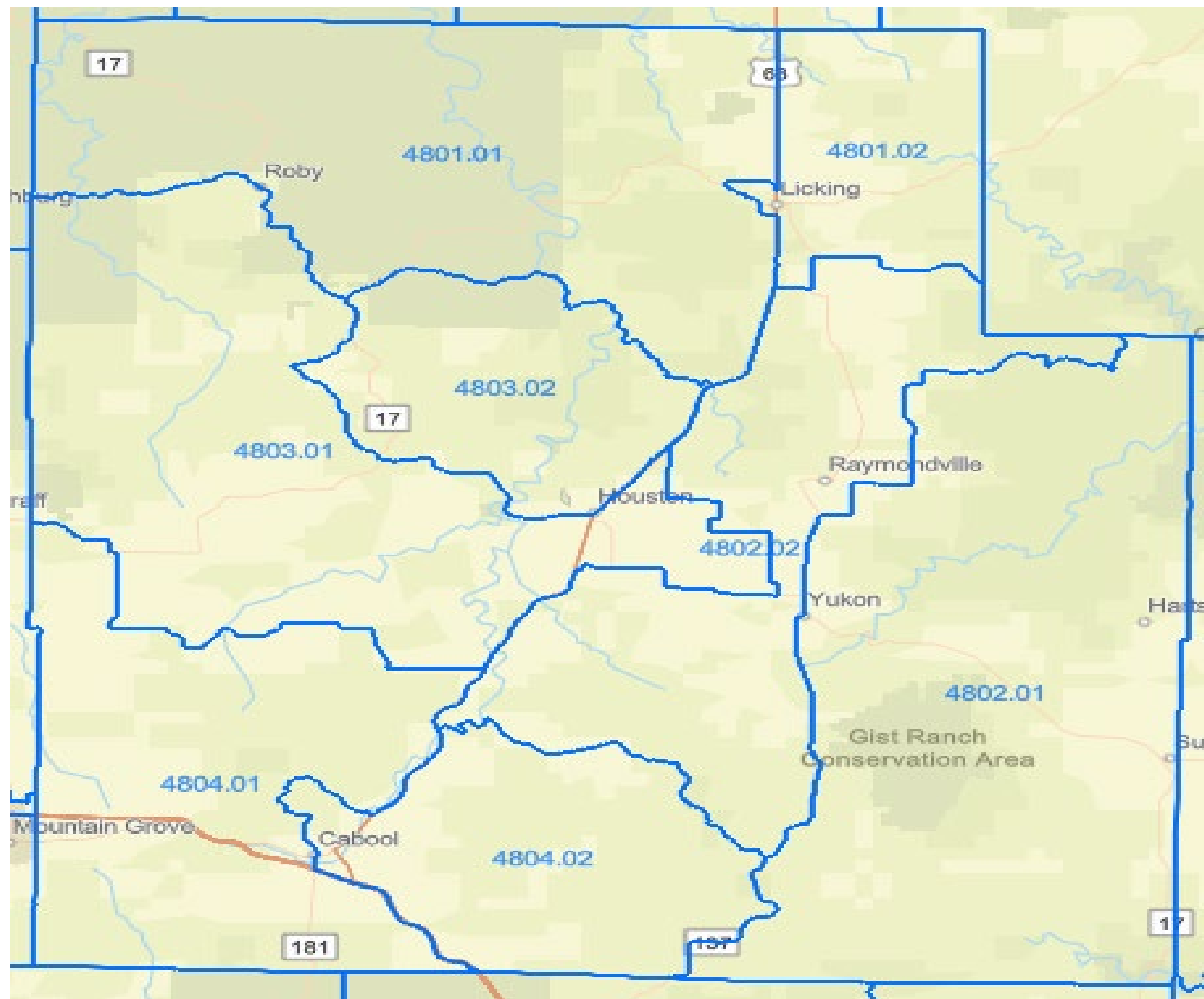
**Upper-Income:** Individual income that is 120 percent or more of the area median income, or a median family income that is 120 percent or more in the case of a geography.

**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.

# West Plains Bank and Trust Company Assessment Area







## **WEST PLAINS BANK & TRUST COMPANY COMMUNITY REINVESTMENT ACT PUBLIC FILE**

### **Branches Opened**

July 1993	
January 1995	The bank opened its Liberty Bank branch in Mountain View. Liberty Bank is a full service facility offering all bank products.
May 1995	The bank converted its North Bank branch from a limited service branch to a full service branch. All bank products are available at North Bank.
May 1996	The bank installed a proprietary ATM in the Wal Mart store in Mountain View.
June 1997	The bank installed a proprietary ATM in its Broadway Bank facility in West Plains.
April 1998	The bank installed proprietary ATMs in the Go Convenience #9 store and the Snappy Mart convenience store in West Plains.
August 1998	The bank installed a proprietary ATM in the Go Convenience #8 store.
March 1999	The bank installed proprietary ATMs at the Main Bank and two Casey's convenience stores in West Plains.
March 2000	The bank installed a proprietary ATM at a Casey's convenience store in Mountain View.
August 2000	The bank relocated its Liberty Branch facility from 112 N. Oak in Mtn. View to 607 N. Elm in Mtn. View. Facility has more space, more drive-up lanes, and a 24 hour ATM.
November 2000	The bank opened its Bradford Branch limited service facility. This branch will process transactions through drive-up lanes. No lobby, new account, or loan service will be available.
February 2001	The bank installed a proprietary ATM at Go Convenience #10 store in Pomona.
August 2001	The bank installed a proprietary ATM at Lucky's Country Store convenience store in Birch Tree.
January 2002	The bank opened a loan production office in the real estate brokerage office in West Plains.
March 2005	The bank installed a proprietary ATM at Ozarks Medical Center in West Plains.
November 2008	Established a new proprietary ATM at the Current River Convenience Store in Van Buren.
January 2010	The bank opened a new and large Liberty Bank Branch facility at the same location in Mountain View, Missouri.
September 2018	The bank installed a proprietary ATM at West Plains Civic Center in West Plains.
November 2020	The bank opened its Willow Springs branch in Willow Springs, MO. This is a full-service facility offering all bank products.
January 2021	The bank installed a proprietary ATM in Alton, MO.
June 2021	The bank opened Loan Production office in Houston, MO.
	The bank opened its Houston, MO branch. This is a full-service facility offering all bank products

**WEST PLAINS BANK & TRUST COMPANY**  
**COMMUNITY REINVESTMENT ACT PUBLIC FILE**

**Branches Closed**

March 1995	The bank lost its lease for a proprietary ATM in the Wal*Mart store in West Plains, and the machine was removed.
October 1999	The bank lost its lease for a proprietary ATM in the Wal*Mart store in Mountain View, and the machine was removed.
January 2001	Due to low transaction volume, the bank discontinued its lease for ATM space in two Casey's convenience stores in West Plains, and the machines were removed.
February 2002	Due to personnel changes, the bank closed its loan production office in the real estate brokerage office in West Plains.
May 2003	The bank lost its lease for a proprietary ATM in the Snappy-Mart convenience store in West Plains, and the machine was removed.
August 2009	Due to low transaction volume, the bank discontinued its lease for ATM space in Casey's Convenience store in Mountain View and the machine was removed.
November 2009	Due to low transaction volume, the bank discontinued its lease for ATM space in New Mountain Convenience store in Van Buren and the machine was removed.
December 2009	Due to low transaction volume, the bank discontinued its lease for three proprietary ATM's in the Jump Oil Company's stores #336 and #337 in West Plains and #338 in Pomona and the machines were removed.
January 2011	Due to low transaction volume, the bank discontinued its lease for ATM space in Lucky's Country Store. The machine was removed.
March 2012	The bank lost it lease for proprietary ATM in the West Plains Civic Center in West Plains, and the machine was removed.

# WEST PLAINS BANK & TRUST COMPANY

## LOCATIONS INCLUDING ATMs

### I. Full Service Branches (All Services Available)

1. **Main Bank** 11 Court Square, West Plains, MO 65775  
Census Tract: Missouri (29) Howell County (091) **Tract #0907 LM**  
Hours: Lobby: Monday - Friday 9:00 a.m. - 4:30 p.m.  
ATM: Available during lobby hours.  
Coin Counter: Available during lobby hours
2. **North Branch** 1601 Porter Wagoner Blvd., West Plains, MO 65775  
Census Tract: Missouri (29) Howell County (091) **Tract #0908.02 LM**  
Hours: Lobby: Monday – Friday 9:00 a.m. - 6:00 p.m.  
Saturday 9:00 a.m. -12:00 noon  
Drive-up Lanes: Monday - Friday 7:00 a.m. - 6:00 p.m.  
Saturday 9:00 a.m. -12:00 noon  
ATM: 24 hours a day (Deposit Capable)  
Coin Counter: Available during lobby hours.
3. **Liberty Branch** 607 N. Elm Mountain View, MO 65548  
Census Tract: Missouri (29) Howell County (091) Tract **#0902.00 Distressed**  
Hours: Lobby: Monday - Friday 9:00 a.m. - 4:30 p.m.  
Saturday 8:30 a.m. - 12:00 noon  
Drive-up Lane: Monday - Friday 8:00 a.m. - 6:00 p.m.  
Saturday 8:30 a.m. - 12:00 noon  
ATM: 24 hours a day (Deposit Capable)  
Coin Counter: Available during lobby hours
4. **Willow Springs Branch** 708 E. Main Willow Springs, MO 65793  
Census Tract: Missouri (29) Howell County (091) **Tract #0901.01 Distressed**  
Hours: Lobby: Monday - Friday 9:00 a.m. - 4:30 p.m.  
Saturday 9:00 a.m. - 12:00 noon  
Drive-up Lane: Monday - Friday 8:00 a.m. - 6:00 p.m.  
Saturday 9:00 a.m. - 12:00 noon  
ATM: 24 hours a day (Deposit Capable)
5. **Houston, MO.** 1473 S Sam Houston Blvd Houston, MO 65483  
Census Tract: Missouri (29) Texas County (215) Tract **#4803.01 Distressed**  
Hours: Lobby: Monday - Friday 9:00 a.m. – 5:00 p.m.  
Saturday 9:00 a.m. - 12:00 noon  
Drive-up Lane: Monday - Friday 8:00 a.m. - 6:00 p.m.  
Saturday 9:00 a.m. - 12:00 noon  
ATM: 24 hours a day (Deposit Capable)

### II. Limited Service Branches (Deposit Transactions Only)

1. **Broadway Branch** 318 Broadway, West Plains, MO 65775  
Census Tract: Missouri (29) Howell County (091) Tract **#0908.01 LM**  
Hours: Drive-up Lanes: Monday – Friday 8:00 a.m. - 6:00 p.m.  
Saturday 8:00 a.m. - 12:00 noon  
ATM: (Deposit Capable) 24 hours a day
2. **Bradford Branch** 301 N Kentucky, West Plains, MO 65775  
Census Tract: Missouri (29) Howell County (091) **Tract #0908.01 LM**  
Hours: Drive-up Lanes: Monday – Friday 8:00 a.m. - 6:00 p.m.  
Saturday 8:00 a.m. - 12:00 noon  
ATM: 24 hours a day (Deposit Capable)

### III. Other Locations

1. Mountain Home Loan Center - (Loan production service only),  
1160 Hometown Commons, Mountain Home, AR 72653  
Census Tract: Arkansas (05) Baxter County (005) Tract #9502.00  
Hours: Monday - Friday 9:00 a.m. - 5:00 p.m.
2. OMC ATM – (ATM only)

Ozarks Medical Center 1100 N. Kentucky, West Plains MO 65775  
Census Tract: Missouri (29) Howell County (091) Tract #0908  
Hours: 24 hours a day

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3. Alton ATM –(ATM only) Deposit  
306 Couch Street Alton, MO 65606  
Census Tract: Missouri (29) Oregon County (149) Tract #4801.00 LM  
Hours: 24 hours a day
- 

**IV. Other Account Access Available**

- a) Telephone Banking (VRU) 24 hours a day
- b) Internet Banking / Mobile Banking 24 hours a day (*Mobile Banking is deposit capable*)
- c) Bill Pay 24 hours a day

**Houston Branch was opened in June 2021 and no branches were closed in the current or previous two calendar years.**

# Schedule Of Fees

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Service	Fee
Account Activity Printout	\$5.00
Account Balancing Assistance	\$20.00 per hour
Account Charge off Fee	\$25.00
Account Research	\$20.00 per hour, \$1.00 per copy
ATM Card or Debit Card (replacement)	\$10.00
ATM Transactions	
WPB&TC ATM	FREE
Foreign ATM (not owned by WPB&TC)	\$1.00
Cashier's Checks (Customer Only)	\$5.00 each
Coin Counting (Non-customer or Business Customer)	1% of total - \$5.00 minimum
Collection Item (Incoming or Outgoing)	\$15.00
Deposited Items Returned Unpaid	\$5.00 each
Dormant Account Fee	\$5.00 per month

Service	Fee
Early Account Closure Fee (First 90 days)	\$25.00
Fax	\$3.00 per page
Foreign Item Collection Fee	\$25.00
Garnishment/Levies (per garnishment or levy)	\$50.00
Night Drop Bag (Locked)	\$30.00
Notary Public Service (Customer Only)	FREE
Non-sufficient Funds (NSF) - Each Item	\$29.00*
Overdraft - Each Item Paid	\$29.00*
Overdraft Protection Transfer	\$4.00
Official Check Cashed (Non-Customer with ID)	Greater of 1% OR \$10.00
Returned Statement Fee	\$5.00 per statement
Safe Deposit Boxes	
3x5	\$20.00
5x5	\$30.00
3x10	\$40.00
5x10	\$65.00
10x10	\$115.00
Stop Payments - Each Item	\$29.00
Telephone Transfer Fee	\$2.00

Service	Fee
Domestic Wire Transfers	
Incoming (customer only)	\$10.00
Outgoing (customer only)	\$20.00
International Wire Transfers	
Incoming (customer only)	\$40.00
Outgoing (customer only)	\$60.00
Zipper Bank Bag	\$5.00

\*Created by check, in-person withdrawal, ATM withdrawal, or other electronic means

# Loan-to-Deposit Ratio

## For Each Quarter of the Previous Calendar Year

<u>Quarter Ended</u>	<u>Deposits Ratio</u>
03/31/13	73.45%
06/30/13	79.23%
09/30/13	77.26%
12/31/13	72.60%
03/31/14	73.78%
06/30/14	74.55%
09/30/14	71.05%
12/31/14	70.41%
03/31/15	75.70%
06/30/15	78.36%
09/30/15	81.53%
12/31/15	81.45%
03/31/16	87.27%
06/30/16	82.43%
09/30/16	86.21%
12/30/16	83.46%
03/31/17	88.81%
06/30/17	87.58%
09/30/17	81.23%
12/31/17	80.29%
03/31/18	86.31%
06/30/18	84.79%
09/30/18	87.11%
12/31/18	83.23%
03/31/19	85.82%
06/30/19	87.72%
09/30/19	90.85%
12/31/19	87.26%
03/31/20	90.04%
06/30/20	72.97%



<b><u>Quarter Ended</u></b>	<b><u>Deposits Ratio</u></b>
9/30/20	72.88%
12/31/20	65.20%
03/31/21	67.27%
06/30/21	59.95%
09/30/21	57.95%
12/31/21	60.23%
03/31/22	59.77%
06/30/22	64.14%
09/30/22	67.22%
12/31/22	67.41%
03/31/23	68.60%
06/30/23	69.92%
09/30/23	70.53%
12/31/2023	69.99%

# Community Reinvestment Act Notice

Under the federal Community Reinvestment Act (CRA), the Federal Deposit Insurance Corporation (FDIC) evaluates our record of helping to meet the credit needs of this community consistent with safe and sound operations. The FDIC also takes this record into account when deciding on certain applications submitted by us.

Your involvement is encouraged.

You are entitled to certain information about our operations and our performance under the CRA, including, for example, information about our branches, such as their location and services provided at them; the public section of our most recent CRA Performance Evaluation, prepared by the FDIC; and comments received from the public relating to our performance in helping to meet community credit needs, as well as our responses to those comments. You may review this information today.

At least 30 days before the beginning of each quarter, the FDIC publishes a nationwide list of the banks that are scheduled for CRA examination in that quarter. This list is available from the Regional Director, FDIC, Division of Depositor and Consumer Protection, (DCP), 1100 Walnut St, Suite 2100, Kansas City, MO 64106. You may send written comments about our performance in helping to meet community credit needs to, Compliance Officer, West Plains Bank and Trust Company, 11 Court Square, P. O. Box 378, West Plains MO 65775 and FDIC Regional Director. You may also submit comments electronically through the FDIC's Web site at [www.fdic.gov/regulations/cra](http://www.fdic.gov/regulations/cra). Your letter, together with any response by us, will be considered by the FDIC in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the FDIC Regional Director. You may also request from the FDIC Regional Director an announcement of our applications covered by the CRA filed with the FDIC. We are an affiliate of West Plains Bancshares, INC, a bank holding company. You may request from the Officer In Charge Of Supervision, Federal Reserve Bank of St. Louis, P. O. Box 442, St. Louis, MO 63166 an announcement of applications covered by the CRA filed by bank holding companies.

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Your involvement is encouraged.

You are entitled to certain information about our operations and our performance under the CRA. You may review today the public section of our most recent CRA evaluation, prepared by the FDIC, and a list of services provided at this branch. You may also have access to the following additional information, which we will make available to you at this branch within five calendar days after you make a request to us: (1) a map showing the assessment area containing this branch, which is the area in which the FDIC evaluates our CRA performance in this community; (2) information about our branches in this assessment area; (3) a list of services we provide at those locations; (4) data on our lending performance in this assessment area; and (5) copies of all written comments received by us that specifically relate to our CRA performance in this assessment area, and any responses we have made to those comments. If we are operating under an approved strategic plan, you may also have access to a copy of the plan.

At least 30 days before the beginning of each quarter, the FDIC publishes a nationwide list of the banks that are scheduled for CRA examination in that quarter. This list is available from the Regional Director, FDIC, Division of Depositor and Consumer Protection (DCP), 1100 Walnut St, Suite 2100, Kansas City, MO 64106. You may send written comments about our performance in helping to meet community credit needs to (name and address of official at bank) and the FDIC Regional Director. You may also submit comments electronically through the FDIC's Web site at [www.fdic.gov/regulations/cra](http://www.fdic.gov/regulations/cra). Your letter, together with any response by us, will be considered by the FDIC in evaluating our CRA performance and may be made public.

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# Federal Housing Finance Agency Community Support Statement

FHFA Form 060  
OMB Number 2590-0005  
Expires 04/30/2026

FHFA Federal Home Loan Bank (FHLBank) Member ID Number: 13555  
Name of FHLBank Member Institution: West Plains Bank and Trust Company  
Mailing Address: 11 Court Square  
City: West Plains  
Submitter Name: [REDACTED]  
Work Email: [REDACTED]

State: MO

Zip Code: 65775

Title: [REDACTED]

## Part I. Community Reinvestment Act (CRA) Standard:

Most recent CRA rating: Satisfactory

Year of most recent CRA rating: 2023

**Part II. First-time Homebuyer Standard:** All Federal Home Loan Bank members must complete either Section A or B of this part, except that members with "Outstanding" federal CRA ratings need not complete this part. Members should use data or activities for the previous or current calendar year in completing this part.

**A. Complete the following two questions:** If your institution did not make, or did not track, mortgage loans to first-time homebuyers, you must complete Section B of this part.

1. Number of mortgage loans made to first-time homebuyers 0
2. Dollar amount of mortgage loans made to first-time homebuyers \$0

## B. Check as many as applicable:

- |   |     |
|---|-----|
| 1. Offer in-house first-time homebuyer program (e.g., underwriting, marketing plans, outreach programs)   | Yes |
| 2. Offer in-house lending products that serve first-time homebuyers or low- and moderate-income homebuyers  | No  |
| 3. Offer flexible underwriting standards for first-time homebuyers  | No  |
| 4. Participate in nationwide first-time homebuyer programs (e.g., Fannie Mae, Freddie Mac)  | Yes |
| 5. Participate in federal government programs that serve first-time homebuyers (e.g., FHA, VA, USDA RD)   | Yes |
| 6. Participate in state or local government programs targeted to first-time homebuyers (e.g., mortgage revenue bond financing)  | No  |
| 7. Provide financial support or technical assistance to community organizations that assist first-time homebuyers   | Yes |
| 8. Participate in loan consortia that make loans to first-time homebuyers   | No  |
| 9. Participate in or support special counseling or homeownership education targeted to first-time homebuyers  | Yes |
| 10. Hold investments or make loans that support first-time homebuyer programs   | Yes |
| 11. Hold mortgage-backed securities that may include a pool of loans to low- and moderate-income homebuyers   | Yes |
| 12. Use affiliated lenders, credit union service organizations, or other correspondent, brokerage or referral arrangements with specific unaffiliated lenders, that provide mortgage loans to first-time or low- and moderate-income homebuyers | No  |
| 13. Participate in the Affordable Housing Program or other targeted community investment/development programs offered by the Federal Home Loan Bank   | Yes |
| 14. Other (attach description of other activities supporting first-time homebuyers; see instructions for Part II)   | No  |
| 15. None of the above (attach explanation of any mitigating factors; see instructions for Part II)  | No  |

If you checked Question 14 or 15, please explain below. If your explanation will exceed 300 characters, please upload a file containing your explanation and supporting documents:

Supporting documents:

## Part III. Certification:

By submitting this Community Support Statement, I certify that I am a senior official of the above institution, that I am authorized to provide this information to FHFA, and that the information in this Statement and any attachments is accurate to the best of my knowledge.

Paperwork Reduction Act Statement: Notwithstanding any other provision of the law, no person is required to respond to, nor shall any person be subject to a penalty for failure to comply with, a collection of information subject to the requirements of the Paperwork Reduction Act, unless that collection of information displays a currently valid OMB Control Number.