



PUBLIC DISCLOSURE

July 18, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

GNCBank, National Association
Charter Number 13347
100 E. Forest Avenue
Girard, Kansas 66743

Office of the Comptroller of the Currency
7101 College Blvd., Suite 1600
Overland Park, Kansas 66210

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

Institution's CRA Rating: This institution is rated **Satisfactory**.

The lending test is rated: Outstanding.

The community development test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on an overall assessment of GNBank, National Association's (GNB) combined performance of lending in the states of Kansas and Colorado within its delineated assessment areas (AA). Performance in the state of Kansas received the greatest weight with 86.3 percent of bank loans and 84.3 percent of total bank deposits.
- The Community Development (CD) Testing rating is based on an aggregate assessment of the bank's CD activities for loans, investments, and services in Kansas and Colorado AAs. As noted above, we placed more weight on the performance in the state of Kansas.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's loan-to-deposit (LTD) ratio is reasonable. GNB's quarterly average LTD ratio is 73.3 percent from June 30, 2019 through March 31, 2022. GNB's LTD ratio ranged from a low of 59.1 percent to a high of 85.6 percent. The average quarterly LTD ratio for five similarly situated institutions over the same period is 70.4 percent. The asset size of these institutions ranged from \$503.8 million to \$1.0 billion, with an average asset size of \$761.6 million.

Lending in Assessment Area

A majority of GNB's loans were originated inside its AAs. The bank originated and/or purchased 81.9 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Consumer	37	92.5	3	7.5	40	352	98.3	6	1.7	358
Small Farm	94	78.3	26	21.7	120	6,175	85.9	1,017	14.1	7,192
Total	131	81.9	29	18.1	160	6,527	86.5	1,023	13.5	7,550
<i>Source: Bank Data Due to rounding, totals may not equal 100.0%</i>										

Description of Institution

GNB is a \$954 million multi-state community bank headquartered in Girard, Kansas. It is owned by GN Bankshares, Inc., a one-bank holding company. In April 2019, GNB successfully acquired First National Bank of Girard. GNB has 15 branch locations with an automated teller machine (ATM) located in 11 of the branches. They primarily serve 17 rural counties throughout the state of Kansas and the eastern border of Colorado. These counties make up the three AAs including Kansas non-MSA, Jackson County Kansas, and Colorado non-MSA.

GNB offers a full range of deposit and loan products and services. As of December 31, 2021, total loans of \$478.8 million represent 49.9 percent of total assets. Agricultural related loans remain GNB's primary loan product, totaling \$214.5 million, or 44.8 percent of total loans. The remainder of the loan portfolio is comprised of 37.1 percent commercial and commercial real estate loans, 12.7 percent one- to four-family residential real estate, and 2.8 percent consumer loans. In addition, deposits of \$757.8 million represent 79.0 percent of total assets. Tier 1 capital totals \$92.3 million.

There are no legal, financial, or other factors impeding GNB's ability to meet the credit needs of its AAs. GNB received a "Satisfactory" rating under the Intermediate Small Bank Standards at the previous CRA examination, dated May 28, 2019.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The Office of the Comptroller of the Currency (OCC) used intermediate small bank examination procedures to evaluate GNB's record of meeting the credit needs of its community through its lending activities. Consistent with GNB's business strategy, the bank's primary product is agricultural loans, by dollar and number, in the Kansas AAs. In the Colorado non-MSA AA, primary products are agricultural loans (by dollar) and consumer loans (by number). The evaluation period for the Lending Test is January 1, 2019 through December 31, 2021. This evaluation also included an assessment of the bank's CD lending, services, and investment activities.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is a blend of the ratings for the state of Kansas and the state of Colorado.

The state of Kansas received the greatest weight in arriving at the overall CRA rating. By dollar, the state of Kansas has 86.3 percent of GNB's loans and 78.8 percent by number. In addition, the state of Kansas has 12 of the 15 total banking locations and 84.3 percent of total bank deposits.

The Kansas non-MSA AA received the greatest weight in arriving at the overall rating for the state of Kansas. By dollar, the AA has 92.7 percent of the loans in the state of Kansas and 91.6 percent by number. In addition, the Kansas non-MSA has 91.1 percent of the deposits in the state of Kansas and 11 bank locations.

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

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by, or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

State Rating

State of Kansas

CRA rating for the State of Kansas¹: Satisfactory

The Lending Test is rated: Outstanding

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- Lending in moderate-income geographies reflects reasonable dispersion. There are no low-income geographies.
- Lending to small farms with revenues of \$1 million or less reflects excellent penetration.
- GNB's aggregate level of responsiveness to CD needs is Satisfactory.

Description of Institution's Operations in Kansas

Kansas non-MSA AA

The Kansas non-MSA AA includes the counties of Atchison, Brown, Cherokee, Clark, Clay, Comanche, Crawford, Edwards, Ford, Hamilton, Hodgeman, Kiowa, Nemaha, and Woodson. GNB is headquartered in Crawford County with 10 additional branches across the AA in Arma, Bucklin, Clay Center, Galena, Girard, Hiawatha, Horton, Offerle, Pittsburg, Wetmore, and Yates Center. There is a 24-hour non-deposit taking ATM located in nine of the locations.

Based on 2015 Census data, there are four moderate-income, 36 middle-income, and five upper-income census tracts in the AA. There are no low-income tracts in the AA. Although most tracts are identified as middle-income, the demographic data shows many census tracts are either distressed or underserved. Of the 36 middle-income census tracts within the AA, eight are underserved due to the remote rural location and six of those eight are also distressed due to population loss. Demographic data shows the population in the AA is 157.5 thousand with a median family income of \$57.2 thousand. The AA has 16.2 percent of households below the poverty level and 12.3 percent of families below the poverty level.

Top employment sectors in the AA are in services, agriculture, and retail. The Kansas Department of Labor reports the December 2021 unemployment rates for the 14 counties ranging from a low of 0.8 percent in Hamilton to a high of 2.4 percent in Woodson. The average rate for the 14 counties was 1.5 percent. This compares to the state of Kansas unemployment rate at the time of 2.0 percent and the Bureau of Labor Statistics December 2021 national unemployment rate of 3.9 percent.

There is strong competition for financial services in the AA. According to the FDIC market share data, as of June 30, 2021, GNB's deposits in the AA totaled \$566.3 million with a market share of 11.2 percent, which ranks first out of 50 depository institutions in the market. Significant competitors include other community banks operating in the AA with numerous bank locations throughout Kansas. Deposits

¹ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

from counties within this AA account for the majority of GNB's deposit base at 76.9 percent of total deposits.

During the examination, we reviewed two community contacts within the AA. One contact noted that there are a lot of lending opportunities in the area; however, there is a high level of competition in agricultural lending. The contact stated that financial institution competition is very aggressive in the area and bank's also have competition from the FSA and Frontier Farm Credit. One contact specifically noted that GNB is by far the most active and involved, not only with helping with city business, but also with lending and investing in the community.

The following table provides a summary of demographics, including housing and business information for the Kansas non-MSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Kansas non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	45	0.0	8.9	80.0	11.1	0.0
Population by Geography	157,481	0.0	8.3	79.7	12.1	0.0
Housing Units by Geography	69,379	0.0	8.0	80.0	11.9	0.0
Owner-Occupied Units by Geography	40,721	0.0	5.9	82.6	11.4	0.0
Occupied Rental Units by Geography	18,679	0.0	11.4	74.9	13.7	0.0
Vacant Units by Geography	9,979	0.0	10.3	78.9	10.8	0.0
Businesses by Geography	10,067	0.0	11.6	76.7	11.7	0.0
Farms by Geography	1,615	0.0	1.4	77.5	21.2	0.0
Family Distribution by Income Level	39,256	21.1	17.7	22.6	38.7	0.0
Household Distribution by Income Level	59,400	24.7	17.3	17.9	40.1	0.0
Median Family Income Non-MSAs - KS		\$57,229	Median Housing Value			\$90,144
			Median Gross Rent			\$616
			Families Below Poverty Level			12.3%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Jackson County Kansas AA

The Jackson County Kansas AA includes Jackson County which is part of the Topeka, Kansas MSA. This AA includes two branches in Holton, Kansas with one 24-hour non-deposit taking ATM.

Based on 2015 Census data, there are three middle-income census tracts in the AA. There are no low- or moderate-income census tracts. There are no distressed or underserved census tracts. Demographic data shows the population in the AA is 13.4 thousand with a median family income of \$65.0 thousand. The AA has 10.0 percent of households below the poverty level and 5.5 percent of families below the poverty level.

Top employment sectors in the AA are services, retail, and agriculture. The Kansas Department of Labor reports the December 2021 unemployment rate for the county at 1.8 percent. This compares to the state of Kansas unemployment rate at the time of 2.0 percent and the Bureau of Labor Statistics December 2021 national unemployment rate of 3.9 percent.

According to the FDIC market share data, as of June 30, 2021, GNB's deposits in the AA totaled \$55.1 million with a market share of 15.1 percent, which ranks last out of the three institutions in the market. The top competitor has 68.4 percent of the deposit market share with a total of \$249.3 million. There are six offices located in the AA compared to the limited population of 13.4 thousand.

During the examination we reviewed one community contact within the AA. The contact noted all credit needs are being met. He stated there is a high level of competition in agricultural lending and financial institution competition is very aggressive in the area.

The following table provides a summary of demographics, including housing and business information for the Jackson County, KS AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Jackson County Kansas						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	3	0.0	0.0	100.0	0.0	0.0
Population by Geography	13,400	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	5,764	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	3,974	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	1,307	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	483	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	820	0.0	0.0	100.0	0.0	0.0
Farms by Geography	113	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	3,816	16.2	22.2	24.0	37.6	0.0
Household Distribution by Income Level	5,281	19.7	18.4	19.8	42.1	0.0
Median Family Income MSA - 45820 Topeka, KS MSA		\$64,984	Median Housing Value			\$118,568
			Median Gross Rent			\$625
			Families Below Poverty Level			5.5%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Kansas

Examiners completed full-scope reviews in the Kansas non-MSA and the Jackson County Kansas AAs. The Kansas non-MSA AA carried the most weight with 91.1 percent of the deposits in the state of Kansas and 11 bank locations. Based on loan dollar volume, the Kansas non-MSA makes up 92.7 percent of GNB's loans in the state of Kansas and 91.6 percent by number of loans. The borrower

distribution carried the most weight in the analysis due to the limited farm locations in LMI census tracts. There are no limited-scope areas. Refer to Appendix A for a list of all AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN Kansas

LENDING TEST

The bank's performance under the Lending Test in Kansas is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full scope review, the bank's lending performance in the state of Kansas is excellent.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the state.

Small Loans to Farms

Refer to Table S in the state of Kansas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Kansas non-MSA AA

The overall geographic distribution of small loans to farms is reasonable. While the bank made no loans in moderate-income tracts, demographics show that only 1.4 percent of small farms are in these geographies and aggregate peer data is less than one percent. There is strong competition in the AA with 49 other lenders. In addition, the four moderate-income census tracts are in small cities encompassing developed areas, leaving few locations for farms. An analysis of low-income geographies is not meaningful since none of the AA census tracts are designated low-income.

Jackson County, Kansas AA

An analysis of the geographic distribution in Jackson County was not completed. There are no low- or moderate-income CTs so an analysis would not be meaningful.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

Small Loans to Farms

Refer to Table T in the state of Kansas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Kansas non-MSA AA

The overall borrower distribution of small loans to farms is excellent. The distribution of small loans to farms with revenues of less than \$1 million exceeds the demographic indicator and significantly exceeds the peer aggregate.

Jackson County Kansas AA

The overall borrower distribution of small loans to farms is excellent. The distribution of small loans to farms with revenues of less than \$1 million is near to the demographic indicator and significantly exceeds the peer aggregate.

Responses to Complaints

GNB did not receive any written complaints regarding its CRA performance during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the state of Kansas is rated Satisfactory.

Conclusions for Areas Receiving a Full Scope Review

Based on a full-scope review, the bank exhibits adequate responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment area.

The OCC placed the greatest weight on the performance in the Kansas non-MSA AA with 91.1 percent of deposits in the state of Kansas in this AA and 86.7 percent of the bank branches in Kansas located in this AA, including the bank headquarters.

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Kansas non-MSA	11	64.6	7,859	50.6
Jackson County Kansas	3	17.7	3,880	25.0
Regional	3	17.7	3,782	24.4
Total	16	100.0	15,521	100.0

Kansas non-MSA AA

GNB demonstrated excellent responsiveness to CD needs and opportunities in the Kansas non-MSA AA during the evaluation period. Management originated 11 CD loans totaling \$7.9 million which is 12.3 percent of allocated tier 1 capital. Loans included business loans for promoting economic development, revitalization and stabilization, and affordable housing. Notable loan examples include affordable housing for LMI individuals to a tribal Housing Authority, economic development for building a business in a moderate-income tract and job creation.

Jackson County Kansas AA

GNB demonstrated excellent responsiveness to CD needs and opportunities in the Jackson County Kansas AA during the evaluation period. Management originated three qualifying community development loans totaling \$3.9 million or 62.5 percent of allocated tier 1 capital. Loans promoted economic development by providing businesses with resources to expand and grow permanent jobs. Loans also went to providing distressed and underserved communities resources to expand infrastructure. Notable examples include loans to expand and develop farmland, and a loan to construct new duplexes for LMI individuals.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Kansas non-MSA	0	0	24	29	24	60.0	29	3.0	0	0
Jackson County Kansas	0	0	10	2	10	25.0	2	.002	0	0
Regional/State	4	437	2	510	6	15.0	947	96.8	0	0
Total	4	437	36	541	40	100.0	978	100.0	0	0

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

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

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

Kansas non-MSA AA

GNB demonstrated poor responsiveness to CD investment opportunities in the Kansas non-MSA AA during the evaluation period. The bank presented no prior period investments and no current period investments in the AA. Management made 24 qualified donations, totaling \$29 thousand to 10 organizations in the AA during the evaluation period, representing less than 0.04 percent of allocated tier 1 capital. Donations supported organizations who provide community services primarily to low- and moderate-income individuals or those that support small businesses. Examples of qualified investments included providing funding to a local food pantry that primarily serves LMI individuals and funding the purchase of essential infrastructure in distressed and underserved middle-income census tracts. GNB also provided funding to community-based organizations that build affordable housing for LMI individuals.

Jackson County Kansas AA

GNB demonstrated poor responsiveness to CD investment opportunities in the Jackson County Kansas AA during the evaluation period. Management made 10 qualifying donations in the AA totaling \$2 thousand which is less than 0.01 percent of allocated tier 1 capital. Donations went to projects to aid low- and moderate-income individuals within the AA. There were no donations presented at the previous CRA exam. Notable examples include donations to give away coats to low moderate-income families and donations to food pantries giving away free food to low- and moderate-income individuals.

Extent to Which the Bank Provides Community Development ServicesKansas non-MSA AA

GNB provided an adequate level of CD service needs within the AA. The bank had 11 employees provide 1,752 hours of CD services to seven qualified CD organizations.

Examples of service hours include the following:

- Board member for a HUD funded organization that provides affordable rental housing for low to moderate-income individuals.
- Committee member of organization that provide low interest rate micro small business loans to small businesses; and
- Board member of a youth organization that provides mentoring opportunities for children of low- and moderate-income individuals.

Jackson County Kansas AA

GNB demonstrated very poor responsiveness to CD service needs in the AA. There were no services reported in this AA for the current exam period.

Broader Statewide and/or Regional Community Development Activities

GNB originated three CRA CD qualified loans totaling \$3.8 million to organizations that serve the broader statewide or regional area during the evaluation period. These loans had no impact on the banks AAs. Notable loans made included a loan to an organization that collects donated food stuffs and

allocates food to various food pantries and communities in need as well as several loans to businesses located in LMI or distressed and/or underserved areas through the SBAs Paycheck Protection Program.

GNB also made two qualified investments, totaling \$510 thousand to two organizations that serve the broader statewide or regional area during the evaluation period. One investment was in low-income housing tax credits that provide affordable housing to low or moderate-income individuals and the other investment was to an organization that provides low-rate micro small business loans. Management provided four prior period qualified donations, totaling more than \$437 thousand to one organization that provides affordable housing to low and moderate-income individuals. Both investments impact the banks AAs in the State of Kansas and the low-income housing tax credits also impact the Colorado AA.

GNB employees provided 315 hours of CD Services statewide by three employees to two organizations.

Examples of the service hours included:

- Overseeing affordable housing projects as a board member.
- Working to attract and maintain small businesses in the communities.

State of Colorado

CRA rating for the State of Colorado²: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- Lending in moderate-income geographies reflects reasonable dispersion.
- Lending to small farms with revenues of \$1 million or less reflects a reasonable penetration.
- GNB's aggregate level of responsiveness to CD needs is satisfactory.

Description of Institution's Operations in Colorado

The Colorado non-MSA AA includes the counties of Kiowa and Prowers. GNB operates two branches in the AA, located in Eads and Lamar, Colorado. There is a 24-hour non-deposit taking ATM located in the Lamar branch.

Based on 2015 Census data, there are three moderate-income and three middle-income census tracts in the AA. There are no low-income and upper-income census tracts in the AA. The three middle-income census tracts are considered distressed and underserved due to population loss and remote rural location. Demographic data shows the population in the AA is 13,698 with a median family income of \$60,701. The AA has 18.5 percent of households below the poverty level and 13.7 percent of families below the poverty level.

Top employment sectors in the AA are in services, agriculture, and retail. The December 2021 unemployment rate in the AA was 3.0 percent, compared to the state of Colorado unemployment rate of 4.2 percent and the Bureau of Labor Statistics December 2021 national unemployment rate of 3.9 percent.

There is moderate competition for financial services in the AA. According to the FDIC market share data, as of June 30, 2021, GNB's deposits in the AA totaled \$115.4 million with a market share of 23.1 percent, which ranks second out of 5 depository institutions in the market. Frontier Bank had the largest market share with 29.5 percent of the market deposits. Other competitors include Community State Bank, TBK Bank, and Legacy Bank. Deposits from counties within this AA account for 15.7 percent of the bank's total deposits.

During the examination, we reviewed one community contact within the AA. The contact indicated that the local economic conditions are depressed with a declining population, but credit demands are being met due to the number of financial institutions in the area. The contact stated financial institutions are involved in community development projects and initiatives but there are local revitalization projects and initiatives that institutions can participate in and/or support as well as needs for housing improvements and development for attracting businesses.

² This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: CO NonMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	6	0.0	50.0	50.0	0.0	0.0
Population by Geography	13,698	0.0	41.4	58.6	0.0	0.0
Housing Units by Geography	6,719	0.0	42.4	57.6	0.0	0.0
Owner-Occupied Units by Geography	3,706	0.0	40.6	59.4	0.0	0.0
Occupied Rental Units by Geography	1,733	0.0	37.7	62.3	0.0	0.0
Vacant Units by Geography	1,280	0.0	54.2	45.8	0.0	0.0
Businesses by Geography	1,158	0.0	48.4	51.6	0.0	0.0
Farms by Geography	199	0.0	41.2	58.8	0.0	0.0
Family Distribution by Income Level	3,702	27.5	22.5	18.3	31.7	0.0
Household Distribution by Income Level	5,439	31.3	18.0	19.9	30.8	0.0
Median Family Income Non-MSAs - CO		\$60,701	Median Housing Value			\$87,687
			Median Gross Rent			\$586
			Families Below Poverty Level			13.7%
<i>Source: 2015 ACS and 2021 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Colorado

Examiners completed a full-scope review of the bank's sole AA in Colorado. There are no limited scope areas.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN Colorado

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's lending performance in the state of Colorado is reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the state.

Small Loans to Farms

Refer to Table S in the state of Colorado section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

The overall geographic distribution of small loans to farms is reasonable. The distribution of small loans to farms in moderate-income geographies is near to the percentage of farms in moderate-income geographies but is somewhat lower than area demographics. All middle-income census tracts are considered distressed for population loss and underserved. There is moderate competition in the AA with four other lenders. An analysis of low-income geographies is not meaningful since none of the AA census tracts are designated low-income.

Consumer Loans

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

The overall geographic distribution of consumer loans is reasonable. The distribution of consumer loans in moderate-income geographies is slightly above area demographics. All the middle-income census tracts in the AA are considered distressed for population loss and underserved. The household poverty level in the AA is 18.5 percent. An analysis of low-income geographies is not meaningful since none of the AA census tracts are designated low-income.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

Small Loans to Farms

Refer to Table T in the state of Colorado section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

The overall borrower distribution of small loans to farms is excellent. The distribution of small loans to farms with revenues less than \$1 million exceeds both the peer aggregate and the demographic indicator.

Consumer Loans

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

The overall borrower distribution of consumer loans is reasonable. The distribution of consumer loans to moderate-income borrowers significantly exceeds area demographics and is considered excellent. The distribution of the bank's consumer loans to low-income borrowers is significantly below area demographics and is considered poor. Competition from other financial institutions is moderate serving a population of 14,000. In addition, the poverty level in this AA is high. Approximately 18.5 percent of the AA households live below the poverty level.

Responses to Complaints

GNB did not receive any written complaints regarding its CRA performance during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the state of Colorado is rated Satisfactory.

Conclusions for Areas Receiving a Full Scope Review

Based on a full-scope review, GNB exhibits adequate responsiveness to CD needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AA.

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Colorado non-MSA	8	100.0%	\$5,617	100.0%

GNB demonstrated excellent responsiveness to CD needs and opportunities in the Colorado non-MSA AA during the evaluation period. Management originated eight CD loans totaling \$5.6 million or 43.2 percent of allocated tier one capital. Loans promoted economic development by providing job growth, retention, and supplementing wages during the COVID-19 pandemic and provided community resources in distressed and underserved census tracts. Notable examples include a loan that helped build infrastructure of distressed and underserved communities and pay-check protection program loans to maintain wages during the COVID-19 pandemic.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Colorado non-MSA	0	\$0	4	\$6	4	100.0%	\$6	100.0%	0	\$0

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

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

GNB demonstrated poor responsiveness to CD needs and opportunities in the Colorado non-MSA AA. Management made four qualifying donations in the AA totaling \$6 thousand, which represents less than .01 percent of allocated tier 1 capital. Donations went to projects to aid low and moderate-income individuals. Notable examples include donations of financial education software to schools that have more than 50 percent of students eligible for the free and reduced lunch program.

Extent to Which the Bank Provides Community Development Services

GNB provided an adequate level of CD services within the AA. The bank had two employees provide 120 hours of CD services to two different organizations. A notable example includes services with the Prowers County Economic Prosperity Board to help bring in new businesses to the distressed and underserved community.

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

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSA(s) and non-MSA(s) that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	01/01/2019 – 12/31/2021	
Bank Products Reviewed:	Small farm and consumer loans Community development loans, qualified investments, community development services	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Kansas		
Kansas non-MSA AA	Full-scope	<i>Counties of Atchison, Brown, Cherokee, Clark, Clay, Comanche, Crawford, Edwards, Ford, Hamilton, Hodgeman, Kiowa, Nemaha, Woodson</i>
Jackson County Kansas AA	Full-scope	<i>Jackson County Kansas (part of the Topeka Kansas MSA)</i>
Colorado		
Colorado non-MSA AA	Full-scope	<i>Counties of Kiowa and Prowers</i>

Appendix B: Summary of MMSA and State Ratings

RATINGS GNBANK, National Association			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank / State Rating
GNB	Outstanding	Satisfactory	Satisfactory
State:			
Kansas	Outstanding	Satisfactory	Satisfactory
Colorado	Outstanding	Satisfactory	Satisfactory

(*) The Lending Test and Community Development Test carry equal weight in the overall rating.

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

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

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder’ and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

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

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

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

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

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

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

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

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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

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

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

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

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

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

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

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

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank’s assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area

Kansas

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2019-21	
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	
Jackson County Kansas	36	865	53.7	12	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0	
Kansas non-MSA	31	2,958	46.3	505	0.0	0.0	0.0	1.4	0.0	0.6	77.5	87.1	79.2	21.2	12.9	20.2	0.0	0.0	0.0	
Total	67	3,823	100.0	517	0.0	0.0	0.0	1.3	0.0	0.6	78.9	93.6	79.7	19.8	12.9	19.7	0.0	0.0	0.0	

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 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												2019-21	
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		
Jackson County Kansas	36	865	53.7	12	99.1	97.2	33.3	0.0	2.8	0.9	0.0		
Kansas non-MSA	31	2,958	46.3	505	96.4	100.0	35.2	2.6	0.00	1.0	0.0		
Total	67	3,823	100.0	517	96.6	98.6	35.2	2.4	2.8	1.0	0.0		

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Colorado

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
Colorado non-MSA	31	2,957	100.0	113	0.0	0.0	0.0	41.2	33.3	65.5	58.8	66.7	34.5	0.0	0.0	0.0	0.0	0.0	0.0
Total	31	2957	100.0	113	0.0	0.0	0.0	41.2	33.3	65.5	58.8	66.7	34.5	0.0	0.0	0.0	0.0	0.0	0.0

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

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
Colorado non-MSA	31	2,957	100.0	113	97.0	100.0	77.9	2.5	0.0	0.5	0.0
Total	31	2,957	100.0	113	97.0	100.0	77.9	2.5	0.0	0.5	0.0

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Colorado non-MSA	37	352	100.0	0.0	0.0	39.6	40.5	60.4	59.5	0.0	0.0	0.0	0.0

*Source: 2015 ACS Census; 01/01/2019 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2019-21	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Colorado non-MSA	37	352,049	100.0	31.3	8.11	18.0	32.43	19.9	37.84	30.8	21.62	0.0	0.0	
Total	37	352,049	100.0	31.3	8.11	18.0	32.43	19.9	37.84	30.8	21.62	0.0	0.0	

*Source: 2015 ACS Census; 01/01/2019 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*