



Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

January 02, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Golden Bank, National Association
Charter Number **18558**

9315 Bellaire Boulevard
Houston, TX 77036

Office of the Comptroller of the Currency

Two Houston Center
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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: Satisfactory

The community development test is rated: Satisfactory

The major factors that support this rating include:

- The Lending Test rating is based on a more than reasonable loan-to-deposit (LTD) ratio, a majority of loans originated inside the assessment area (AA), excellent geographic distribution, and reasonable borrower distribution to small businesses.
- The Community Development (CD) Test rating is based on overall adequate performance. The bank had stronger performance in CD loans and services. The bank relied heavily on prior-period investment balances, with minimum new donations.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the LTD ratio is more than reasonable.

The quarterly average LTD ratio since the previous CRA examination was 94.9 percent, ranging from a low of 88.9 percent to a high of 103.3 percent. Our analysis included five similarly situated banks in the AAs. The comparator quarterly average LTD ratio was 86.8 percent for the same period, ranging from a low of 55.5 percent to a high of 107.4 percent.

Lending in Assessment Area

A majority of the bank's loans are inside its AAs.

The bank originated and purchased 87 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		
	#	%	#	%		\$	%	\$	%	
Small Business	279	86.9	42	13.1	321	272,576	91.0	26,901	9.0	299,477
Total	279	86.9	42	13.1	321	272,576	91.0	26,901	9.0	299,477

Description of Institution

Golden Bank, National Association (GBNA) is a minority-owned community bank located in Houston, Texas and is headquartered at 9315 Bellaire Boulevard. GBNA was chartered in 1985 as Texas First National Bank. As of December 31, 2022, GBNA operates five branch offices in Texas, five branches in California, and one loan production office (LPO) in California. During the evaluation period, GBNA opened branches in Rowland Heights, California (January 2021), Millbrae, California (May 2021), and Cupertino, California (June 2022). Additionally, GBNA closed the Champions Branch in Houston, Texas in August 2021.

As of December 31, 2022, GBNA reported \$1.53 billion in total assets and reported a tier 1 leverage capital ratio of 13.4 percent. By dollar, the loan portfolio consisted of 75 percent commercial loans, with the majority secured by commercial real estate, 13 percent residential real estate loans, 3 percent multifamily loans, 9 percent construction loans and less than 1 percent consumer loans.

GBNA offers a variety of lending products for consumers and businesses. The primary lending focus is business-related loans including Small Business Administration (SBA) loans. GBNA provides a comprehensive line of deposit products and other services including online and mobile banking, wire transfers, remote deposit capture, merchant services, safe deposit boxes, check cards, and night deposit.

In 2020, the SBA established the Paycheck Protection Program (PPP) under the Coronavirus Aid, Relief, and Economic Security (CARES) Act in response to the COVID-19 pandemic. The goal of the program was to aid small businesses by funding payroll costs, mortgages, rent, and utilities. GBNA originated a total of 1,650 PPP loans totaling \$109.3 million.

GBNA received a “Satisfactory” rating at the prior CRA evaluation dated October 19, 2020. There are no legal or financial impediments to GBNA’s ability to meet the credit needs of the AAs.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the Lending and CD Tests was January 1, 2020, through December 31, 2022. As commercial loans represented 75 percent by dollar and 63 percent by number of the loan portfolio, we reviewed commercial loans during this evaluation.

During the 2020-2021 evaluation period, we compared small business loans to 2021 CRA aggregate data. We performed a separate analysis for 2022 loans due to 2020 U.S. Census demographic changes. In 2022, we compared small business loans to 2022 CRA aggregate data.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of the AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same MSA, multistate metropolitan statistical area (MMSA), or 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 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 state ratings, and where applicable, multistate ratings.

More weight was given to the performance in Texas as 80 percent of GBNA's deposit base is in Texas compared to 20 percent in California.

The MMSA rating and state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each state and MMSA Rating 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 Texas

CRA rating for the State of Texas¹: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- An excellent geographic distribution of small business loans located in low-and-moderate income (LMI) CTs.
- A reasonable distribution of loans to businesses of different sizes.
- Adequate responsiveness to CD. Performance was stronger for CD loans and services. The bank relied on prior-period investment balances, with minimum new donations.

Description of Institution's Operations in Texas

GBNA operates five locations across two AAs in the state of Texas. The state of Texas has 80 percent of total bank deposits.

The Houston AA consisted of all counties in the Houston-Pasadena-The Woodlands MSA (Houston MSA), which contained Austin, Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery, and Waller counties. In Harris County, the Bellaire branch was in a low-income CT and the Harwin branch was in a moderate-income CT. In Fort Bend County, the Sugar Land branch was located in a middle-income CT.

The Dallas-Fort Worth CSA (Dallas CSA) consisted of Collin, Dallas, Denton, Hunt, Kaufman, Rockwall, and Tarrant counties. The Plano branch was in Collin County and the Richardson branch was in Dallas County. Both branches were located in moderate-income CTs.

According to FDIC Deposit Market Share data as of June 30, 2023, GBNA held deposits totaling \$971 million, which represented 0.09 percent market share and ranked the bank 68th of 398 institutions within the state. The largest depository institutions were Charles Schwab Bank, JP Morgan Chase Bank, and Bank of America, which held a combined 62 percent market share in the state.

Community Contacts

We identified six community contacts in the Houston MSA during the evaluation period. The majority of these indicated a need for affordable housing and more opportunities for small business loans in the area. The cost of housing has increased drastically with the average home sale price of \$294 thousand in 2020. One of these contacts also mentioned the need for new or rehabilitated public recreational facilities in the area. One university economic development center stated the area was negatively impacted by the 2020 COVID-19 pandemic and the February 2021 winter storm.

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.

The following tables provide information on the demographic composition of the Houston MSA for both evaluation periods.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Houston MSA (2020-2021)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,072	14.8	29.0	25.6	29.5	1.1
Population by Geography	6,346,653	11.6	25.9	27.9	34.2	0.4
Housing Units by Geography	2,402,507	12.2	25.3	27.2	35.1	0.3
Owner-Occupied Units by Geography	1,314,631	5.2	21.3	29.4	44.1	0.1
Occupied Rental Units by Geography	854,011	20.9	30.2	24.6	23.7	0.6
Vacant Units by Geography	233,865	19.5	29.6	24.0	26.6	0.3
Businesses by Geography	676,071	9.1	17.8	23.1	49.7	0.2
Farms by Geography	10,422	5.1	16.2	30.4	48.2	0.1
Family Distribution by Income Level	1,530,226	24.4	16.1	17.1	42.4	0.0
Household Distribution by Income Level	2,168,642	24.9	15.9	16.8	42.4	0.0
Median Family Income MSA – 26420 Houston-The Woodlands-Sugarland, TX MSA		\$69,373	Median Housing Value			\$172,974
			Median Gross Rent			\$972
			Families Below Poverty Level			12.8%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Houston MSA (2022)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,606	13.4	25.0	26.5	31.8	3.2
Population by Geography	7,122,240	10.5	23.9	28.8	35.1	1.6
Housing Units by Geography	2,646,682	11.3	24.1	28.2	34.7	1.8
Owner-Occupied Units by Geography	1,466,613	4.9	20.0	30.7	43.5	0.8
Occupied Rental Units by Geography	941,380	20.1	29.9	24.4	22.6	3.1
Vacant Units by Geography	238,689	15.7	25.6	27.5	28.2	3.0
Businesses by Geography	1,023,984	8.6	19.1	24.6	45.7	2.1
Farms by Geography	14,449	5.7	17.9	30.2	44.7	1.5
Family Distribution by Income Level	1,702,047	23.6	16.6	17.9	41.9	0.0
Household Distribution by Income Level	2,407,993	24.6	15.9	16.9	42.6	0.0
Median Family Income MSA – 26420 Houston-The Woodlands-Sugarland, TX MSA		\$81,859	Median Housing Value			\$228,998
			Median Gross Rent			\$1,170
			Families Below Poverty Level			10.6%
Source: 2020 U.S. Census and 2022 D&B Data. Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Scope of Evaluation in Texas

We selected the Houston MSA for full-scope review, as it accounts for 82 percent of deposits and 60 percent of branches in Texas. We performed a limited-scope review of the Dallas CSA, as it accounts for 18 percent of deposits and 40 percent of branches in Texas.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TEXAS

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Distribution of Loans by Income Level of the Geography

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

Small Loans to Businesses

Refer to Table Q 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 businesses.

Houston MSA

Overall, the geographic distribution is excellent.

During 2020-2021, the geographic distribution of small business loans was excellent. The proportion of bank loans exceeded the percent of businesses and the aggregate data in both low- and moderate-income (LMI) CTs. During 2022, the percent of bank loans was significantly below the percent of businesses and the aggregate data in low-income CTs but significantly exceeded the percent of businesses and aggregate data in moderate-income CTs.

Lending Gap Analysis

There were no unexplained conspicuous gaps identified.

Distribution of Loans by Income Level of the Borrower

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

Small Loans to Businesses

Refer to Table R 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 businesses.

Houston MSA

Overall, the borrower distribution of loans to businesses is reasonable.

During 2020-2021, the percentage of small business loans was significantly lower than the percentage of small businesses but exceeded the aggregate lending by all financial institutions. However, the bank reported a high percentage of loans made to businesses with unreported revenue at 40 percent. This was attributed in part to the bank's participation in PPP lending, which did not require collection of revenue information from businesses. During 2022, the percentage of small business loans was significantly lower than the percentage of small businesses but exceeded the aggregate lending by all financial institutions.

Responses to Complaints

There were no complaints related to CRA performance within Texas.

Conclusions for Area Receiving Limited Scope Reviews

Based on a limited-scope review, the bank's performance under the Lending Test in the Dallas-Fort Worth CSA is consistent with the bank's 2020-2021 performance under the Lending Test in the full scope area. In 2022, the Dallas-Fort Worth CSA geographic performance was stronger than performance in the full-scope area but the borrower distribution was consistent with the performance in the full-scope area. The bank made 351 PPP loans totaling \$22.5 million in the Dallas-Fort Worth CSA, in response to the pandemic.

COMMUNITY DEVELOPMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank exhibits adequate responsiveness to CD needs in the state through CD loans and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AA. The bank's CD investment performance is weaker than its CD loan and service performance.

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 \$
Houston MSA	10	35.7	6,973	19.7
Dallas CSA	11	39.3	11,234	31.6
Statewide	4	14.3	7,703	21.7
Outside AAs	3	10.7	9,570	27
Total	28	100	35,480	100.0

Houston MSA

GBNA originated ten loans in the Houston MSA totaling \$7 million or 5 percent of allocated tier 1 capital, which had a neutral impact on lending performance in Texas. GBNA helped meet community credit needs through its CD lending, which primarily supported economic development. One loan helped an organization provide community services by providing legal assistance and free medical and dental assistance to LMI individuals and families.

Broader Statewide

GBNA originated four broader statewide CD loans totaling \$7.7 million, which all supported economic development. The bank made an additional three loans outside of Texas and California totaling \$9.6 million, which supported economic development and affordable housing to LMI individuals and families.

Number and Amount of Qualified Investments

The Qualified Investment Table, shown below, sets forth the information and data used to evaluate the bank's level of qualified CD investments. The table includes all CD investments, including prior period investments that remain outstanding as of the examination date.

<i>Qualified Investments</i>								
Assessment Area	Prior Period*		Current Period		Total			
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Houston MSA	3	1,835	11	30	14	66.7	1,865	45.8
Dallas CSA	3	2,206	4	3	7	33.3	2,209	54.2
Total	6	4,041	15	33	21	100.0	4,074	100.0

Houston MSA

Performance in the Houston MSA reflects poor responsiveness when considering the volume of bank deposits and market share in the AA. Investments and donations totaled \$1.9 million or 1.4 percent of allocated tier 1 capital. Current period investments consisted exclusively of 11 donations totaling \$30,103. Prior period investments consisted of two bonds that support affordable housing needs and a capital fund that benefits small business programs. Donations provided support to eight organizations that focus on the needs of LMI individuals and essential services in the AA.

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

The following are examples of the notable donations during this evaluation period.

- A \$2,500 donation to a local medical clinic that offers free flu shots to LMI individuals.
- A \$10,000 donation for the purchase of face masks to be distributed to multiple organizations across the Houston MSA that include frontline healthcare workers and first responders.
- A \$10,000 donation to a local school in support of improved technology where 88 percent of the students are economically disadvantaged.

Extent to Which the Bank Provides Community Development Services

GBNA provided adequate responsiveness to its community. During the evaluation period, GBNA employees provided 347 hours of service to 13 community service organizations in the Houston MSA. These services were primarily financial seminars and financial literacy programs but employees also donated their time to distribute masks during the pandemic, packaged and distributed school supplies to their community, and coordinated an event to provide seasonal flu shots for LMI individuals.

Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, CD loan and investment performance was stronger in the Dallas CSA than the full-scope area. CD services performance was consistent with the full-scope area. GBNA made a significant level of CD loans in the Dallas AA, which has a significantly positive impact on lending performance in the AA. All 11 CD loans totaling \$11.2 million supported economic development. Investments were stronger because of a lower deposit base when compared to allocated tier 1 capital. Consistent with the full-scope area, new donations were minimal and there were no current period investments. GBNA employees provided 119 hours of service to four community service organizations in the Dallas CSA.

State Rating

State of California

CRA rating for the State of California: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- An excellent geographic distribution of small business loans located in LMI CTs.
- A reasonable distribution of loans to businesses of different sizes.
- Adequate CD activities. Performance was stronger for CD loans and services. The bank relied on prior-period investment balances, with minimum new donations.

Description of Institution's Operations in California

GBNA operates five branches and one LPO throughout two AAs in California. The state accounts for 20 percent of total bank deposits.

The Los Angeles CSA consisted of Orange, Los Angeles, Riverside, and San Bernardino counties. The Tustin branch is in a middle-income CT in Orange County. The Alhambra and Rowland Heights branches are both located in moderate-income CTs in Los Angeles County.

The San Francisco CSA consisted of San Francisco, San Mateo, Santa Clara, and Alameda counties. The Cupertino branch is in a moderate-income CT in Santa Clara County and the Fremont branch is in a middle-income CT in Alameda County. The Millbrae branch is in an upper-income CT in San Mateo County.

According to FDIC Deposit Market Share data as of June 30, 2023, GBNA held deposits totaling \$360 million, which represented 0.02 percent market share and ranked the bank 148th of 325 institutions within the state. The largest depository institutions were Bank of America, JP Morgan Chase Bank, and Wells Fargo Bank, which held a combined 53.6 percent market share in the state.

Community Contacts

We identified four community contacts in the Los Angeles CSA during the evaluation period. One contact indicated although Los Angeles County is seeing a decline in home prices: the area remains unaffordable given the price increases that have occurred over the past years. Most first-time home buyers cannot afford to purchase a single-family home. Another contact indicated there was a need for financial literacy training for small business owners, as well as opportunities for banks to partner with local small business organizations to promote small business lending.

The following tables provide information on the demographic composition of the Los Angeles CSA for both evaluation periods.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Los Angeles (2020-2021)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	3,751	8.2	28.4	28.3	33.4	1.6
Population by Geography	17,547,258	7.8	28.6	29.0	34.0	0.5
Housing Units by Geography Owner-	6,062,644	6.9	26.2	28.7	37.9	0.3
Occupied Units by Geography Occupied	2,901,683	2.6	18.5	30.3	48.5	0.1
Rental Units by Geography Vacant Units	2,684,296	11.5	34.5	26.7	26.7	0.6
by Geography	476,665	6.5	25.9	31.2	35.8	0.7
Businesses by Geography	1,859,232	4.8	20.2	26.4	47.1	1.6
Farms by Geography	21,687	3.8	20.1	30.1	45.5	0.7
Family Distribution by Income Level	3,892,727	24.0	16.4	17.5	42.1	0.0
Household Distribution by Income Level	5,585,979	25.4	15.6	16.4	42.7	0.0
Median Family Income MSA - 11244 Anaheim-Santa Ana-Irvine, CA	\$86,003		Median Housing Value			\$448,193
Median Family Income MSA - 31084 Los Angeles-Long Beach-Glendale, CA	\$62,703		Median Gross Rent			\$1,322
Median Family Income MSA - 40140 Riverside-San Bernardino-Ontario, CA MSA	\$61,507		Families Below Poverty Level			13.4%

Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0%
 (*) The NA category consists of geographies that have not been assigned an income classification.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Los Angeles 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	4,096	5.5	27.8	31.4	33.0	2.3
Population by Geography	17,800,837	4.9	28.0	32.6	33.4	1.1
Housing Units by Geography	6,227,476	4.7	25.9	31.8	36.5	1.1
Owner-Occupied Units by Geography	3,011,733	1.6	18.4	33.6	46.0	0.4
Occupied Rental Units by Geography	2,737,275	8.0	34.4	30.2	25.6	1.7
Vacant Units by Geography	478,468	4.5	24.6	30.1	38.7	2.1
Businesses by Geography	2,165,937	3.3	19.4	29.0	46.0	2.3
Farms by Geography	24,360	2.7	18.8	32.3	45.0	1.2
Family Distribution by Income Level	3,982,791	23.2	16.7	18.3	41.8	0.0
Household Distribution by Income Level	5,749,008	25.3	15.4	17.0	42.4	0.0
Median Family Income MSA - 11244 Anaheim-Santa Ana-Irvine, CA	\$106,451		Median Housing Value			\$610,568
Median Family Income MSA - 31084 Los Angeles-Long Beach-Glendale, CA	\$80,317		Median Gross Rent			\$1,631
Median Family Income MSA - 40140 Riverside-San Bernardino-Ontario, CA MSA	\$76,686		Families Below Poverty Level			9.8%

Source: 2020 U.S. Census and 2022 D&B Data. Due to rounding, totals may not equal 100.0%
 (*) The NA category consists of geographies that have not been assigned an income classification.

Scope of Evaluation in California

We selected the Los Angeles CSA for full-scope review, as it accounts for 89 percent of deposits and 50 percent branches in California. We performed a limited-scope review of the San Francisco CSA, as it accounts for the remaining 11 percent of deposits and 50 percent of branches in the state.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CALIFORNIA

LENDING TEST

The bank's performance under the Lending Test in California 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 California is reasonable.

Distribution of Loans by Income Level of the Geography

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

Small Loans to Businesses

Refer to Table Q 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 businesses.

The overall geographic distribution of small loans to businesses is excellent.

Los Angeles CSA

During 2020-2021, the proportion of bank loans exceeded the percent of businesses and the aggregate data in both LMI CTs. During 2022, the percent of bank loans was below the percent of businesses and the aggregate data in low-income CTs but exceeded the percent of businesses and aggregate data in moderate-income CTs.

Lending Gap Analysis

There were no unexplained conspicuous gaps identified.

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 of different sizes, given the product lines offered by the bank.

Small Loans to Businesses

Refer to Table R 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 businesses.

The overall borrower distribution of small loans to businesses by revenue is reasonable.

Los Angeles CSA

During 2020-2021, the percentage of loans to small businesses was significantly lower both the percentage of small businesses and aggregate data. However, the bank reported a high percentage of loans made to businesses with unreported revenue at 54 percent. This was attributed in part to the bank's participation in PPP lending, which did not require collection of revenue information from businesses. During 2022, the percentage of loans to small businesses was significantly lower than the percentage of small businesses but only slightly lower than aggregate data.

Responses to Complaints

There were no complaints related to CRA performance within California.

Conclusions for Area Receiving Limited Scope Reviews

Based on a limited-scope review, there were too few loans to analyze in the San Francisco CSA. The bank originated 16 loans in 2020-2021 and 11 loans in 2022. The bank made 31 PPP loans totaling \$5.9 million in the San Francisco CSA in response to the pandemic.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the CD Test in the state of California is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

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

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 \$
Los Angeles CSA	14	66.7	13,212	63.5
San Francisco CSA	2	9.5	3,550	17.0
Statewide	5	23.8	4,048	19.5
Total	21	100.0	20,810	100.0

Los Angeles CSA

GBNA made a significant level of CD loans in the Los Angeles AA, which had a significantly positive impact on lending performance in California. During the evaluation period, the bank originated 14 loans totaling \$13.2 million. These CD loans supported both economic development and community services for LMI individuals.

Broader Statewide

During both evaluation periods, the bank made five broader statewide CD loans totaling \$4 million that supported economic development.

Number and Amount of Qualified Investments

The Qualified Investment Table, shown below, sets forth the information and data used to evaluate the bank's level of qualified CD investments.

<i>Qualified Investments</i>								
Assessment Area	Prior Period*		Current Period		Total			
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Los Angeles CSA	4	3,720	0	0	4	50.0	3,720	88.5
San Francisco CSA	2	478	2	6	4	50.0	484	11.5
Total	6	4,198	2	6	8	100.0	4,204	100.0

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

Los Angeles CSA

Performance in the Los Angeles CSA reflects adequate responsiveness when considering the volume of deposits and market share in this AA. Total investments and donations in the Los Angeles CSA totaled \$3.7 million or 10.5 percent of allocated tier 1 capital; however, there were no current period investments or donations. Of the four prior period investments, three bonds totaling \$1.7 million continue to have a positive impact supporting affordable housing. Additionally, GBNA made one investment for \$2 million that supported a minority-owned depository institution.

Extent to Which the Bank Provides Community Development Services

During the evaluation period, GBNA employees provided 64 hours of service to four community service organizations in the Los Angeles CSA. These services included education introducing SBA loans for economic development purposes and educational presentations for funding and real-estate organizations.

Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, CD investment performance in the San Francisco CSA was stronger than the performance in the full scope area. CD loan and service performance was consistent with the full-scope AA. Investments and donations in the San Francisco AA totaled \$483,500 or 11 percent of allocated tier 1 capital. The level of CD loans was reasonable and had a positive impact on lending performance in the AA. GBNA originated two loans totaling \$3.5 million that supported economic development. GBNA employees provided 14 hours of service to one community service organization.

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:	01/01/2020 to 12/31/2022	
Bank Products Reviewed:	Small business loans CD loans, qualified investments, CD services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
NA	NA	NA
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State Of Texas		
Houston MSA	Full-Scope	Austin, Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery, and Waller counties
Dallas CSA	Limited-Scope	Collin, Dallas, Denton, Hunt, Kaufman, Rockwall, and Tarrant counties
State of California		
Los Angeles CSA	Full-Scope	Los Angeles, Orange, Riverside, and San Bernardino counties
San Francisco CSA	Limited-Scope	Alameda, San Francisco, San Mateo, and Santa Clara counties

Appendix B: Summary of MMSA and State Ratings

RATINGS			
Golden Bank, National Association			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/ Multistate Rating
	Satisfactory	Satisfactory	Satisfactory
State:			
Texas	Satisfactory	Satisfactory	Satisfactory
California	Satisfactory	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/AA.

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, CTs 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 CT 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 (MSA): 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/AA. 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 Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.

Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

TEXAS

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																	2020-21		
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans		
Houston MSA	35	12,020	41.7	236,116	9.1	29.4	9.4	17.8	20.6	18.6	23.1	23.5	24.3	49.7	26.5	47.5	0.2	0.0	0.1
Dallas CSA	49	10,171	58.3	223,517	6.9	10.9	7.1	18.4	34.8	19.2	26.4	26.1	25.6	47.6	28.3	47.5	0.7	0.0	0.7
Total	84	22,191	100.0	459,633	8.0	22.9	8.3	18.1	26.1	18.9	24.8	21.8	24.9	48.6	29.4	47.5	0.4	0.0	0.4

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		2022	
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans		
Houston MSA	23	24,735	42.6	230,551	8.6	4.4	7.9	19.1	34.8	18.7	24.6	21.7	25.8	45.7	39.1	46.1	2.1	0.0	1.5
Dallas CSA	31	61,784	57.4	223,666	4.7	3.2	4.4	17.6	45.2	18.4	30.4	38.7	29.2	46.4	12.9	47.2	0.9	0.0	0.9
Total	54	86,519	100.0	454,217	6.6	3.8	6.2	18.3	40.0	18.5	27.6	30.2	27.5	46.1	26.0	46.6	1.5	0.0	1.2

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues**2020-21**

Assessment Area:	Total Loans to Small Businesses			Businesses with Revenues <= IMM			Businesses with Revenues > IMM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Bank Loans
Houston MSA	35	12,020	32.9	236,116	88.2	45.7	42.2	4.0	14.3	7.7
Dallas CSA	49	10,171	67.1	223,517	88.4	34.7	43.1	3.6	18.4	8.0
Total	83	22,191	100	459,633	88.3	44.5	42.6	3.8	15.5	7.9

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues**2022**

Assessment Area:	Total Loans to Small Businesses			Businesses with Revenues <= IMM			Businesses with Revenues > IMM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Bank Loans
Houston MSA	23	24,735	42.6	230,551	91.9	56.5	50.1	2.6	39.1	5.5
Dallas CSA	31	61,784	57.4	223,666	91.8	54.8	49.4	2.4	41.9	5.8
Total	54	86,519	100	454,217	91.8	55.7	49.8	2.5	40.5	5.7

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Appendix D-3

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography

2020-21

Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts			Moderate-Income Tracts			Middle Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans		
Los Angeles CSA	54	13,398	77.1	734,238	4.8	14.8	4.6	20.2	27.8	20.6	26.4	31.5	27.1	47.1	25.9	46.5	1.6	0.0	1.3
San Francisco CSA	16	14,622	22.9	194,014	10.8	12.5	10.3	17.6	18.8	18.6	30.4	56.3	32.7	40.5	12.5	37.9	0.8	0.0	0.5
Total	70	28,020	100.0	928,252	6.1	12.9	5.8	19.6	22.8	20.2	27.3	28.7	28.3	45.6	20.7	44.7	1.4	0.0	1.1

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography

2022

Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans		
Los Angeles CSA	40	112,296	78.4	703,936	3.3	2.5	3.1	19.4	22.5	20.2	29.0	37.5	30.4	46.0	37.5	44.5	2.3	0.0	1.9
San Francisco CSA	11	19,772	21.6	180,637	5.9	9.1	6.0	16.6	27.3	18.1	33.0	45.5	35.3	39.7	18.2	37.2	4.8	0.0	3.4
Total	51	132,068	100.0	884,573	3.9	5.8	3.7	18.8	27.8	19.8	29.9	41.5	31.4	44.6	27.9	43.0	2.8	0.0	2.2

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "—" data not available.
Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Appendix D-4

Table S: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-21
Assessment Area:	Total Loans to Small Businesses			Businesses with Revenues <= IMM			Businesses with Revenues > IMM			Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Los Angeles CSA	54	13,398	77.1	734,238	90.4	29.6	45.5	3.7	16.7	5.9	53.7
San Francisco CSA	16	14,622	22.9	194,014	88.4	81.3	47.8	4.6	12.5	7.0	6.3
Total	70	28,020	100	928,252	89.9	56.2	46.0	3.9	15.2	6.2	28.7
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Small Businesses			Businesses with Revenues <= IMM			Businesses with Revenues > IMM			Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Los Angeles CSA	40	112,296	78.4	703,936	91.5	45.0	52.1	3.2	50.0	5.4	5.0
San Francisco CSA	11	19,772	21.6	180,637	89.6	72.7	55.3	4.0	18.2	6.4	9.1
Total	51	132,068	100	884,573	91.1	58.9	52.8	3.3	34.1	5.6	7.1
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.