2021

Corporate Citizenship and ESG Report
Introduction

This document provides disclosure in accordance with the Sustainability Accounting Standards Board (SASB) standards for the Financials – Commercial Banks industry.

In addition, we disclose additional environmental, social and governance (ESG) metrics that are relevant to our business and identify where our efforts and programs help support the United Nations Sustainable Development Goals.

This document covers the period Jan. 1, 2021 through Dec. 31, 2021, unless otherwise noted.
About Our ESG Program

We care about our customers, our associates and our communities. Because we care, we do our best every day to deliver on our promises and meet the ever-evolving needs of the world around us. Those efforts include:

- Advancing inclusive, equitable and sustainable economic growth.
- Remaining committed to the prosperity of the communities we serve.
- Fostering an inclusive environment among a diverse group of associates.
- Employing strong, consistent and transparent governance practices.
- Using an ESG lens in considering long-term financial sustainability and strategic risk management opportunities.

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About UMB

UMB Financial Corporation (Nasdaq: UMBF) is a financial services company headquartered in Kansas City, Missouri. UMB offers commercial banking, which includes comprehensive deposit, lending and investment services, personal banking, which includes wealth management and financial planning services, and institutional banking, which includes asset servicing, corporate trust solutions, investment banking, and healthcare services.

UMB operates branches throughout Arizona, Colorado, Illinois, Kansas, Missouri, Nebraska, Oklahoma and Texas. As the company’s reach continues to grow, it also serves business clients nationwide and institutional clients in several countries.

For more information, visit:

UMB.com
Blog.UMB.com
@UMBBank

3,529 Employees
$1.3B Total Annual Revenue in 2021
91 Branch Locations
Message from our CEO

More than ever, individuals are considering what is most important to them in all areas of their life. From family, lifestyle, and career, to health and personal choices, the past two years have given many the opportunity to reprioritize what is most important to them.

This is something I have spent much time considering as well.

From our business model and approach, to how we engage and support each other and our communities, the past 24 months have provided many opportunities for reflection. Yet, even with change, there is a strength in the steadfast familiarity of what remains the same.

LEGACY OF SUPPORT

In 2004, my first year as UMB Financial Corporation’s CEO, we announced a new brand promise, Count on more. In the nearly 20 years since, it still speaks to our central tenets: our commitment to the communities we serve and the unparalleled service we deliver to our customers and each other.

For UMB, the way we worked and communicated with our customers, our associates and our communities did shift—we found new ways to serve each other, to build relationships, grow our business and support our cities. However, we also had a tried-and-true mission that steered those changes—our Count on more commitment.
Count on more is a rallying cry in our culture, inspiring us to deliver on the promise of being more than the words every company offers—we are dedicated to being the advocate and driving force behind the words.

We believe the idea of counting on more is already very much a part of our company’s past and present, and this has been confirmed time and again through customer testimonials.

STEADFAST COMMITMENT
Our more than 3,500 associates nationwide share core values of integrity and respect, outstanding service, and sought-after expertise. These core values drive all we do internally and externally and are a significant part of why people want to work at UMB.

When you have an established values set to which people are committed, it not only draws the best people but retains them as well. This clearly shows in our wide range of long-tenured associates with deep expertise. Our average tenure for associates is more than nine years, which is twice the industry average. We even have some associates with 50 years of UMB experience, an unheard-of statistic in today’s professional world.

ACCOUNTABILITY AND STEWARDSHIP
As a financial institution, accountability is part of every decision we make, which is why we infuse our values of integrity, trust, strength, commitment and diversity into our core operating strategies. Across the company, we continually identify better ways of doing things to ensure we grow in the most strategic, efficient and inclusive way possible.

Our focus is on being good financial stewards, which in turn serves the economic needs of people and businesses in our neighborhoods. This includes intentional focus on the following areas, among others you’ll find in this report:

- Upholding our rigorous employer standards and associate benefits to attract and retain talent
- Fostering inclusion and diversity internally and externally
- Supporting communities, customers and economies with financial services and education
- Conscientious environmental policies and progress
- Transparent and prudent company governance

UNWAVERING PARTNER
Like the CEOs before me, I am deeply invested in building a company that continues to withstand the test of time, which includes adapting to and being open-minded to business progression, global movements, social evolutions and emerging voices.

My commitment to you is that UMB will continue working hard every day to make you proud of our organization. At UMB, you can Count on more—from me, and from each and every one of our associates as we meet the evolving needs of our clients and communities.
Mariner Kemper
Chairman, President and Chief Executive Officer,
UMB Financial Corporation

Our governance framework is firmly rooted in risk management and compliance and establishes the foundation of our sustainability and ESG program. We continually adapt to find the right balance of business practices, meeting obligations and using our resources to do good. In a complex world, finding that balance is not always easy, but for more than 100 years we’ve run our business on the founding principle of doing what’s right.
Social
Human Rights Statement

We have an established commitment to human rights, as well as safe and healthy working conditions, and we believe in the dignity and value of all individuals.

In line with our core values and doing business with integrity, UMB is firmly committed to operating in a manner consistent with fundamental human rights principles. We strictly prohibit and do not engage in, or contribute to, any manner of forced labor, exploited labor, child labor, or human trafficking, and we will not assist any clients or partners in doing so.

Our beliefs and actions reflect the important principles such as many of those included in the Universal Declaration of Human Rights, which highlights the basic rights and freedoms of all human beings. The success of our company revolves around the voices and minds of our associates that move it forward. Helping people do good for one another is at the heart of what we do—and it’s been that way for more than 100 years.

Our goal is to always exceed the expectations of our associates, customers, shareholders, and communities by delivering our products and services with integrity and trust and providing a workplace that supports equal opportunity, dignity, and respect. As a responsible corporate citizen, UMB will continue to respect and support the promotion of human rights across all our business sectors and locations and will encourage others to do the same.
Employer Standards

As a financial services company, we know our strength stems from our associates, and the foundation of our business is rooted in our customers’ experience. Building a welcoming and enriching company culture is serious business at UMB.

Identifying top talent to exceed our clients’ expectations and return shareholder value is key to our success.
TALENT RECRUITMENT AND RETENTION

Recruiting and retaining talented associates is a core tenet of what makes us a thriving, growth-oriented organization. Our recruitment approach is based on a wide search for talent, with the expectation to present a diverse slate of candidates for openly recruited roles. This approach encourages hiring managers to engage a diverse panel of candidates before making hiring decisions.

We are growing our internship program, with emphasis on working with college and university programs that focus on STEM-related fields (science, technology, engineering and mathematics). In 2021, we doubled our intern cohort from 2020, with 15 interns, and we plan to further expand our program in 2022.

We hire the best people, and they stay with UMB, resulting in long-tenured associates with deep expertise.

9.6 years
average tenure for UMB associates in 2021.
Nearly 2X the industry average

Source: Bureau of Labor Statistics, 2020
**COMPENSATION POLICIES**

UMB’s pay-for-performance compensation philosophy is designed to attract, reward and retain talented individuals who contribute significant value to the organization. Our compensation program rewards performance, reserving the highest rewards for the highest performers. The market-based rewards allow for transparency in the design and administration of job evaluations, job descriptions, grade structures, promotional opportunities, base pay and incentive compensation.

UMB’s incentive plan is intended to promote the interests of the company and its shareholders by providing employees and non-employee directors of the company—those who are largely responsible for the management, growth, and protection of the business of the company—with incentives and rewards to encourage them to continue in the service of the company. Our philosophy is to facilitate and sustain a competitive market-priced structure to support our diverse talent management practices, competitively benchmarking to the median labor market.

**EXECUTIVE COMPENSATION**

As a dynamic and diverse financial institution, it is critical for us to attract, retain and motivate skilled and strategic executives. Strong leadership and governance are important factors for ensuring we can continue to do business well, while doing good for our communities. Our executive compensation committee, comprised of independent board members, closely analyzes several criteria for paying our leadership.

For more information about our compensation practices and objectives, review our proxy statement at InvestorRelations.UMB.com
Associate Development

UMB is committed to developing our talent and enriching associate careers by providing the tools and resources needed to succeed. We believe effective associate development is company-provided, manager-supported and associate-driven.

Throughout our footprint, our team has access to development and educational opportunities, leadership support, and programs that help create an atmosphere of trust, collaboration and unity. We have hands-on resources, opportunities for feedback and coaching, in-person and virtual learning, formal programs and opportunities for associates to extend learning to peers and leaders. And, our online learning management system offers hundreds of e-learning courses on demand.

## UMB Learning Philosophy

- **On-the-job learning**
- **Virtual learning**
- **In-person learning**
- **Formal programs**
- **Real-time experiences**
- **Hands-on resources**
- **Coaching**
- **Feedback**
Developing Leaders

UMB LEADERSHIP AWARDS

We know everyone can be a leader—even those who may not occupy traditional leadership roles. That’s why we created our annual leadership awards, which run on internal nominations from peers, direct reports and managers to recognize associates who demonstrate leadership qualities. These annual awards allow us to recognize UMB leaders at all levels of the organization, in categories such as:

- Drive Performance
- Inclusion and Diversity
- Nurture Relationships
- Think and Act Like an Owner

SUCCESSION PLANS

Having a strong leadership bench is important to the sustainability of our business. Thorough talent and organizational reviews occur annually with our senior executives. In these reviews, succession plans for our line of business leaders and other critical roles are formalized, and then discussed annually with UMB’s board of directors.

EMERGE LEADERSHIP PROGRAM

UMB is proud to offer Emerge, a 12-month opportunity made available to diverse, high-performing talent. Emerge is focused on developing leadership skills in associates who have the potential to lead people, strategy and/or the business. The Emerge curriculum includes a variety of learning methods and leadership topics. All managers are offered the opportunity to participate in virtual micro-sessions focused on a variety of management and leadership topics.

Leadership Resources

- Connections with local universities
- On-site skills seminars
- Coaching and manager development programs
- Accelerate: A program to accelerate the development and readiness of UMB’s next leaders
- Manager development workshop: A three-day workshop that allows managers to hone and refresh their leadership standards
- Professional skills online courses

MENTORSHIP

All associates can access our mentorship series, which provides tools, resources and networking opportunities to help them become, or find a mentor within the organization.
Benefits and Associate Support

With more than 3,500 associates across the country, it’s critical we offer comprehensive and varied benefits.

**Tuition Reimbursement Assistance**
We offer tuition reimbursement assistance so our associates can further their undergraduate or graduate education. Eligible associates may be reimbursed up to $5,000 per calendar year to pursue education in areas that relate to their role within UMB or to the financial services/banking industry.

**Scholarship Program**
Our *Count on more Scholarship Program* is sponsored by the UMB Financial Corporation Charitable Foundation. This merit-based program provides financial assistance to children of UMB associates who plan to continue their education in a college, post-secondary vocational or technical school program.

This program has been in place since 2011 and has so far awarded 128 students with $652,000.

<table>
<thead>
<tr>
<th>Tuition Reimbursement Assistance</th>
<th>$5K</th>
<th>available in assistance per eligible associate, per calendar year</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>$269K+</td>
<td>in reimbursement in 2021</td>
</tr>
<tr>
<td></td>
<td>$3.9M+</td>
<td>in total since 2012</td>
</tr>
</tbody>
</table>
Educational Partnerships
We have partnerships with the University of Kansas Edwards campus, the University of Missouri-Kansas City Bloch School of Management and Park University. These partnerships offer developmental lunch-and-learns and robust courses for all associates on leadership, inclusion and diversity, and other meaningful topics.

Benefits and Wellness
UMB has a robust benefits program that includes:

- Medical, vision and dental insurance
- Health savings and flexible savings accounts
- Financial wellness support
- Insurance offerings, including pet, long-term care and accident insurance
- 401(k) retirement plan with a matching contribution program
- A profit-sharing plan that features an employee stock ownership plan

All these offerings are designed for the well-being and support of our diverse and talented people.
Work/Life Balance and Time Off

We believe our work is an important part of associates’ lives, alongside many other passions—family, community involvement, health and fitness, time off for relaxation and more.

- **Paid Time Off and Sick Leave:** Generous paid time off that scales with your tenure, with a minimum of 20 days per calendar year (some allotments vary depending on hire date).
- **Volunteer Time Off:** Eligible associates receive 16 hours of paid time off to volunteer each year.
- **UMB YOU Day:** 8 hours of paid time off to use for your physical, fiscal or spiritual wellbeing.
- **Adoption Assistance:** UMB supports associates who have chosen to adopt children by providing time off and financial support.
- **Parental Bonding Time and Pregnancy Leave:** UMB offers up to four weeks of paid parental leave for eligible associates so adoptive and birth parents, and legal guardians, have paid time off to care for and bond with a newborn or newly adopted child.
- **Family Medical Care and Leave Act (FMLA):** We provide eligible associates unpaid leave under qualifying circumstances for up to 12 work weeks in a rolling 12-month period.
WELLNESS AND WELL-BEING

Fitness Reimbursement
UMB will reimburse eligible associates for their fitness center or health membership costs up to $250 per calendar year. In addition, the reimbursement program can be used for race/wellness event entry fees and weight management programs.

Health Rooms
Through our benefits team, we provide associates access to comfortable, private and secure health rooms as required for specific health-related activities and needs during their workday at UMB.

Wellness Coaches
UMB offers on-site and virtual wellness coaching to advise associates on nutrition and weight control, health metric improvements, tobacco cessation, stress management and more.

FINANCIAL WELLNESS

Financial wellness is our wheelhouse, which is why we prioritize the financial foundations of our associates through our Associate Banking Program.

- Free financial review to help plan financial goals and strategies
- Special discounts and waivers for investing with UMB
- Competitive banking solutions: checking, savings, personal lending, credit cards, mortgages, investing and financial planning
- Free notary services at any UMB branch
- Exclusive mortgage origination fee waiver
- Interest-bearing checking account based on tiered balances
- UMB Simply Rewards Visa credit card with a special interest rate on purchases
- Discounted brokerage services
ASSOCIATE SUPPORT PROGRAMS

Associate Emergency Fund
When faced with a personal crisis, people sometimes find it difficult to ask their employer for help. At UMB, we want our associates to know we are here to support them in good and bad times. The UMB Associate Emergency Fund is designed to help in times of dire need and offers financial assistance when all other financial resources have been depleted.

Holiday Assistance Program
During the holidays, many families struggle financially to buy a holiday meal or purchase gifts for their children. Some of our fellow UMB associates may experience these same difficulties. UMB offers a Holiday Assistance Program for associates who are experiencing financial burden or hardship and could use some help during the holidays.

Employee Assistance Program
Because UMB is committed to the welfare and well-being of each associate, we provide an Employee Assistance Program to all associates. This program is designed to assist associates in coping with family, personal and/or work-related problems. Services provided through this program are strictly confidential.

Safety
We take the health and safety of our associates very seriously, which is why we have implemented various on-site safety measures and training opportunities for our workforce. We are also equipped with a robust emergency response plan through our security and control stations that help emergency responders access our campus and act as necessary.

AEDs and Training
Automated external defibrillators (AEDs) are installed on every floor in UMB’s main Kansas City campus. We also provide occasional on-site training for associates to learn how and when to use the AEDs.

Active Shooter Training
While no one wants to imagine themselves in an active shooter situation, training could be the key to survival. To enhance preparedness, UMB provides an online training course to all associates that shares resources to help them stay safe. This course outlines UMB’s workplace violence policy and steps to take in an active shooter/hostile intruder situation.
Associate Engagement

Providing a nurturing and supportive associate experience is a key part of our talent strategy. We strive to create an environment that lives up to our promise to associates of More Heart, More Trust and More Opportunity.

We know feedback from associates is critical in understanding the UMB experience. With that in mind, we have generally solicited and measured feedback through two surveys administered in alternating years: The Biannual Engagement Survey and the Manager Effectiveness Survey.

We elected to pause both surveys during the COVID pandemic and instead focus on surveys designed to understand how associates were coping, identify concerns and solicit ideas for navigating the pandemic.

We are reevaluating how we measure the UMB associate experience and have recently launched a new Associate Experience Guide to capture the unique culture at UMB.

MORE HEART
Whether it’s having a heart for each other, our customers or our communities (or often, all of the above), associates care deeply. We support that heartfelt work through inclusive policies and empowering people to create fulfilling lives in and out of the workplace.

MORE TRUST
Associates can have confidence they will be encouraged and expected to do the right thing at all times, no matter what. We do what we say we will and support each other in making decisions based on our values. We’re focused on setting clear expectations and growing a leadership team who is accessible and transparent.

MORE OPPORTUNITY
Each associate brings unique skills and experience to the table, which leads to new ideas. Everyone has a seat at the table here, regardless of hierarchy. Our goal is to grow existing strengths and build new skills. We’re committed to empowering associates to make an impact and achieve their goals through open conversations and providing the tools to develop potential.
Inclusion and Diversity

Our commitment is more than diverse representation. We’ve moved beyond a diversity compliant mindset to view inclusion and diversity as critical to our business. To cultivate an environment of inclusion is to unlock the richness of that diversity, to provide equitable access to financial products and services, and pave the path for diverse suppliers to do business with us as a means to increase wealth and support local economies.

50% of our executive leadership team are women and/or people of color
Educating and increasing awareness among our leaders and associates about inclusion, what it looks like, and the role each of us has is a top priority for UMB. Topics include courage, curiosity, cultural intelligence, mitigating unconscious bias, psychological safety, inclusive leadership and more. The UMB culture ensures we apply an inclusion, equity and diversity lens to all associate policies to foster an associate experience of respect leading to engagement and a sense of belonging. This lens is embedded into our training, recruiting and succession planning practices to further mitigate unconscious bias in talent management processes.

As an early CEO Action for Diversity and Inclusion signatory, we regularly review details and progress of our inclusion strategy with our executives and board. We place inclusion first since only through inclusion can diversity act as a catalyst to belonging and engagement to deliver an unparalleled experience.

**In 2021, 34% of UMB hires were people of color, 52% were women and 2% were veterans.**

Our commitment to diversity is woven through every stage of the associate experience—each touchpoint creating a shared purpose, which encourages individual successes and rewards. We strive to understand our associates’ passions and align with their needs so we can strengthen our connections and work together to further customer goals. Our efforts provide results.

Mariner Kemper
Chairman, President and Chief Executive Officer, UMB Financial Corporation
TRAINING AND ENGAGEMENT

We focus on what is relevant to our unique associate base. Our training conveys why inclusion is important, what inclusion looks like and how each associate is part owner of the company’s inclusion and diversity efforts. For all associates, we provide options to obtain professional development such as self-paced online learning on unconscious bias, microaggressions/affirmations, empathy, and teamwork.

Business Resource Groups (BRGs)
These associate-led groups are valuable resources to our business lines by enhancing associate engagement, providing insight to leaders, and driving change to create a more inclusive culture. Involvement in a business resource group also provides associates with leadership development, project and change management opportunities, mentorship from executives, community volunteerism, and networking with colleagues.

Our BRGs are vital in talent attraction, recruitment, development and retention, which helps us serve our clients and drive business growth. Any associate may join any BRG regardless of identity. That’s what inclusion is all about.

23% of our associates engage and share their voice through BRGs

- Abilities
- Asian American
- Blacks for Empowering People Through Inclusion and Collaboration (B-EPIC)
- Young Professionals
- Pride (LGBTQIA)
- SOMOS (Hispanic/Latino)
- Veterans Engagement Taskforce
- Women
Culture of Inclusion and Respect
We foster a culture of fairness, respect, and equal treatment of our associates, customers, and those in our communities. We have policies in place that provide structure and reporting mechanisms to ensure inclusion and an environment free of harassment, bullying and retaliation. Our associates represent UMB, and our role with our customers and within our communities includes promoting inclusion. We maintain a workplace culture that allows individuals to thrive and be treated with dignity.

We hold ourselves to high standards, and expect our associates to care for one another, our vendors to respect fundamental human rights, and our business partners to operate within the law, free of discrimination and abuse.
Financial Inclusion & Capacity Building

**SASB: FN-CB-240a.1**
Number and amount of loans outstanding qualified to programs designed to promote small business and community development.

**Paycheck Protection Program**

| Total PPP Loans Originated | $2.8B |
| Associates Supporting PPP Process | 200+ |
| States and Territories | 43 |

**Businesses Supported**

<table>
<thead>
<tr>
<th>Count</th>
<th>Balance $(000)</th>
<th>Non-Accrual % of Count</th>
<th>Non-Accrual % of Balance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Small Business Loans (Non-PPP)</td>
<td>4,378</td>
<td>$800,205</td>
<td>0.82%</td>
</tr>
<tr>
<td>Small Business Loans (PPP)</td>
<td>832</td>
<td>$80,238</td>
<td>0.00%</td>
</tr>
<tr>
<td>Small Farm Loans</td>
<td>513</td>
<td>$56,974</td>
<td>2.92%</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td>5,723</td>
<td>$937,416</td>
<td>0.89%</td>
</tr>
</tbody>
</table>

**Customers**

- 85% Existing
- 15% New

**Loans by Size**

- 13% < $150K
- 35% > $1M
- 53% $150K - $1M

**Median Loan Size**

- Round 1: $53K
- Round 2: $27K

**States and Territories**

- 43

**SASB: FN-CB-240a.2**
Number and amount of past due and nonaccrual loans qualified to programs designed to promote small business and community development.

Outstanding loans on the bank’s balance sheet that are reportable as CRA small business or small farm loans based on the FFIEC’s Guide to CRA Data Collection and Reporting and Schedule RC-C of the Consolidated Report of Condition and Income. Please note that Payroll Protection Program (PPP) loans were segmented to help understand the impact of the program on overall portfolio numbers.
UMB Financial Education Center

UMB is committed to helping empower people to meet their personal financial goals. The UMB Financial Education Center allows UMB associates, consumer and commercial customers, and the greater community to access free financial education tools and resources to help address common financial challenges.

Resources include:

• Robust library of financial education playlists
• Blogs with thought leadership and money management topics
• Financial calculators

UMB.com/Education

Since the launch of the UMB Financial Education Center in the second quarter of 2021, the program has garnered:

• **26+ minutes** average user time in the program modules
• **26,300** unique pageviews
• **9,630** financial course starts with top course topics including checking accounts, budgeting, credit cards and insurance
SUPPLIER DIVERSITY

UMB has always been committed to building strong and sustainable relationships with viable, diverse-owned businesses. Through our Supplier Diversity program, we encourage small and minority-owned businesses to provide competitive bids for the materials and services we need, frequently working with firms specializing in human resources, employee education and training, information technology, facilities and general operations.

The strategy is not simply about sourcing procurement opportunities. It also provides financial solutions and education to our diverse business partners to help them be more competitive in today’s global economy. By helping our partners succeed, we succeed as well.

Our investment in the Supplier Diversity program adds unique perspectives, ignites innovation and helps strengthen the communities where we work and live.

Our goal is to give qualified diverse suppliers an opportunity to compete for our business every day and everywhere possible.

Examples include:
- Minority-owned
- Woman-owned Business Enterprise (WBE)
- Small Business Enterprise (SBE)
- Veteran-owned and service disable
- LGBTQIA
Customer Interactions

Fair and Responsible Lending
UMB Bank believes in fairness in lending. Credit is made available on a fair and consistent basis to all people and organizations that meet our lending standards without regard to race, color, religion, national origin, sex, marital status, family status, handicap, age (providing the applicant has the capacity to enter into a binding contract), source of income, or the exercise of rights under the Consumer Credit Protection Act.

We believe all customers and prospective customers deserve access to the best products and services we can provide, and to feel welcomed and valued.

UMB is committed to fairness in all aspects of its business activities, and refrains from using deceptive or misleading advertising or engaging in any practices that might be construed as unfair, deceptive or abusive to consumers. We also seek to incorporate best practices into all aspects of our operations to avoid unintentional acts or practices of an unfair, deceptive or abusive nature.

Each associate is responsible for ensuring nondiscrimination in his or her own area. Every manager is responsible for ensuring nondiscrimination in his or her own department or facility. If we have reason to believe that an associate of this bank has acted in a discriminatory manner, we will promptly investigate and take appropriate steps, which may include disciplinary action or dismissal.

This commitment to fairness has been our practice for many years. It is not only our obligation as a corporate citizen but is fundamental to good business practice and the ongoing strength and stability of our organization.

Complaint Policy
UMB welcomes all feedback and treats complaints as a second opportunity to provide the unparalleled customer experience. The proper handling of individual complaints depends upon accurately identifying the complaint, fully documenting the nature of the grievance, providing a timely response that effectively addresses all relevant issues, and retaining all necessary research conducted to support the resolution in accordance with the document retention policy. UMB will effectively manage the complaint process by monitoring complaints for trend and root cause analyses, communicating key issues to senior management, and adjusting policies and business practices as necessary.

Bank Training Program
The corporate compliance department partners with information security, Bank Secrecy Act / Anti-Money Laundering (BSA/AML), legal, human resources, corporate security and the various lines of business to develop an annual training plan. Associates are provided with training that equips them to perform their job functions and ensures compliance with banking regulations.
Training Groups and Course Assignments
Associates are assigned to training groups based on their job functions, and each group is assigned a curriculum. The training calendar is adjusted each year to deliver course content to associates based on a variety of factors. These factors include, among others, whether the associate is new to the bank or to their role, regulatory changes, and information from the compliance risk assessment process that indicates additional training on a specific topic is necessary. Some courses are also assigned on a rotating basis to ensure associates remain familiar with all applicable regulatory requirements for their job function.

Course Content
UMB utilizes the American Bankers Association (ABA) Frontline Training Program for a majority of course content. Customized content is also developed as necessary by each line of business in collaboration with the Bank Training Department. Each calendar year, the ABA Frontline courses are monitored for updates and updated as necessary due to regulatory changes.

Course Completion Accountability
Tracking of eLearning completion is provided for all associates, who are expected to complete assigned training courses by the end of the calendar year based on their role and position. HR Talent Development sends progress reports to business leaders on the completion rate for their department. Learning courses are not considered complete until the associate receives a passing score. Failure to complete the required training by the established due date may result in disciplinary action, up to and including termination of employment.
Community Development Activities

Community Development Loan and Investment Originations $(000)

<table>
<thead>
<tr>
<th></th>
<th>2020</th>
<th>2021</th>
</tr>
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<tbody>
<tr>
<td>Community Development Loans</td>
<td>$541,726</td>
<td>$582,466</td>
</tr>
<tr>
<td>Community Development Investments</td>
<td>$204,559</td>
<td>$140,899</td>
</tr>
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COMMUNITY REINVESTMENT ACT (CRA) PERFORMANCE EVALUATION

UMB Bank’s last CRA Performance Evaluation was published in May 2020. UMB received a “Satisfactory” performance rating from the Office of the Comptroller of the Currency (OCC) for the evaluation period of 2017-2019.

A helpful summary of the bank’s CRA performance for that time period is included in the published performance evaluation report located at UMB.com/About-UMB/Community-Reinvestment

OUR ACTIONS

UMB maintains a strong CRA performance and continues to enhance the ways it supports the banking needs of the community. In 2021, we expanded beyond our regulatory obligations to offer community development efforts that support underserved communities through the below positions:

- Created a director of community development position and community development banker positions within Consumer Banking to coordinate and drive strategies to reach underserved communities
- Increased the community mortgage banker roles in key markets to focus on underserved communities
- Hired five small business specialists to further our support of small businesses in our communities
- Created a community development lender position in commercial real estate
- Hired a community small business lender in small business banking
Lending and Due Diligence

**SASB: FN-CB-410a.1**
Credit exposure by industry.

**SASB: FN-CB-410a.2**
Description of approach to incorporation of environmental, social, and governance (ESG) factors in credit analysis. Evaluating our customers approach to, and performance on, ESG matters is a component of UMB’s credit analysis process.

We use a mix of publicly available data as well as direct customer contact and site visits to assess how our clients manage risks. By doing this, we make informed decisions and we also guide our customers on best practices as they seek financial and business solutions.

### Loans Outstanding, by Industry

**As of December 31, 2021**

<table>
<thead>
<tr>
<th>NAICS Description</th>
<th>Outstanding ($ millions)</th>
<th>% of Loans</th>
</tr>
</thead>
<tbody>
<tr>
<td>Real Estate Rental &amp; Leasing</td>
<td>4,212</td>
<td>24.5%</td>
</tr>
<tr>
<td>Manufacturing</td>
<td>1,650</td>
<td>9.6%</td>
</tr>
<tr>
<td>Health Care &amp; Social Assistance</td>
<td>1,526</td>
<td>8.9%</td>
</tr>
<tr>
<td>Wholesale Trade</td>
<td>1,210</td>
<td>7.0%</td>
</tr>
<tr>
<td>Other Services (except Public Administration)</td>
<td>1,178</td>
<td>6.9%</td>
</tr>
<tr>
<td>Finance &amp; Insurance</td>
<td>1,095</td>
<td>6.4%</td>
</tr>
<tr>
<td>Construction</td>
<td>1,092</td>
<td>6.4%</td>
</tr>
<tr>
<td>Accommodation &amp; Food Services</td>
<td>836</td>
<td>4.9%</td>
</tr>
<tr>
<td>Agriculture, Forestry, Fishing &amp; Hunting</td>
<td>735</td>
<td>4.3%</td>
</tr>
<tr>
<td>Mining &amp; Utilities</td>
<td>722</td>
<td>4.2%</td>
</tr>
<tr>
<td>Transportation &amp; Warehousing</td>
<td>579</td>
<td>3.4%</td>
</tr>
<tr>
<td>Management of Companies &amp; Enterprises</td>
<td>457</td>
<td>2.7%</td>
</tr>
<tr>
<td>Retail Trade</td>
<td>456</td>
<td>2.7%</td>
</tr>
<tr>
<td>Educational Services</td>
<td>349</td>
<td>2.0%</td>
</tr>
<tr>
<td>Arts, Entertainment &amp; Recreation</td>
<td>327</td>
<td>1.9%</td>
</tr>
<tr>
<td>Professional, Scientific &amp; Technical Services</td>
<td>227</td>
<td>1.3%</td>
</tr>
<tr>
<td>Information</td>
<td>210</td>
<td>1.2%</td>
</tr>
<tr>
<td>Administrative, Support &amp; Waste Management</td>
<td>175</td>
<td>1.0%</td>
</tr>
<tr>
<td>Public Administration</td>
<td>69</td>
<td>0.4%</td>
</tr>
<tr>
<td>Unknown / Other</td>
<td>66</td>
<td>0.4%</td>
</tr>
<tr>
<td><strong>Total Loans</strong></td>
<td><strong>$17,171</strong></td>
<td><strong>100%</strong></td>
</tr>
</tbody>
</table>
During the business development process, UMB conducts due diligence to identify risks our future or current customers may face, which can include ESG specific risks. As we go through the approval process, we do our best to identify material environmental and social risks, such as environmental impact, legal, compliance, and safety issues present in a customer’s operations or credit transaction, as well as any impact on the community.

As we continue to evolve and improve our focus on ESG in lending, we added a process in our internal credit analysis which allows bankers to identify ESG risks specific to each customer or prospect as part of the underwriting and approval process.

Annual reviews or renewals are conducted for all loan customers who meet certain qualifications. During this process, we attempt to identify any new or evolving ESG issues during credit analysis, so the bank may evaluate them.

**Environmental Risk**

UMB follows regulatory requirements to establish comprehensive policies and procedures to manage environmental risk. This includes underwriting, credit analysis and credit decision-making. Our loan documents also require our customers to comply with environmental regulations.

Our environmental risk management program establishes specific levels of due diligence for all real estate secured loans based on loan amount, property type, use, age, and potential for hazardous building materials, as well as consideration of potential high-risk properties.

Relative to these factors, we have established corresponding levels of due diligence. Depending on the specific situation, this may occur at origination, at renewal, or throughout the life of the loan.

As part of our environmental risk management program, we engage a centralized environmental risk manager with EPA/ASTM environmental professionals for initial pre-screening and subsequent third-party report procurement, as well as evaluation of reports. Current environmental laws and due diligence requirements are reviewed and criteria for any environmental mitigation actions or measures are established.

We also periodically review and update our environmental risk management program to comply with regulatory modifications, changes in environmental laws or to reflect our risk tolerance.

Finally, UMB’s environmental risk manager, the director of commercial real estate, and/or the chief credit officer must approve any transaction that contains an exception to this policy.

**Portfolio Analysis**

UMB has established industry concentration limits that are approved by the bank’s management-level credit committee. These limits are monitored by the credit administration team, who report to the chief credit risk officer.

Industry exposures are measured each quarter and reported to the Credit Committee to ensure that industry exposure remains within UMB’s risk tolerances and to ensure appropriate portfolio diversification.
As risks evolve, changes may be made to the bank’s approach and would be approved through our internal governance process.

**ESG Investing Products**

UMB offers a full portfolio of ESG investment options for our clients, from mutual funds to ETFs, with active and passive strategies, across all asset classes. UMB’s dedicated ESG investment team thoroughly and extensively vetted our ESG portfolio over several years to provide an all asset-class ESG offering, spanning multiple asset class categories: domestic large-, mid- and small-cap stocks, international and emerging markets stocks, as well as fixed income. The ESG team actively reviews asset allocations, asset managers and new opportunities to assist investors with their ESG strategies.

With a responsible investing portfolio, clients can access investments that have positive impact, align with their specific values and have enhanced long-term risk/return. Our ESG portfolio can be accessed through UMB Financial Services, Inc., our investment management division, and through an ESG mutual fund through our health savings account investment offerings.

Our ESG investment portfolio was built intentionally, with due diligence, research and patience. We believe an integration of ESG attributes, combined with attractive risk-adjusted returns, is the most prudent focus for clients wanting to align their values with their investments.

From 2018 to year-end 2021, we’ve grown our assets under management in ESG categories

193% (43% annualized)
Community Involvement

For more than a century, UMB has maintained a commitment to the prosperity of each community we serve. In addition to providing financial products designed for the needs of our customers, our associate volunteerism and corporate philanthropy help build strong community partnerships.

Associate Giving
Charitable giving is an important aspect of UMB’s culture, and we support our associates in their individual efforts to make a positive impact in our communities. That is why we proudly offer the UMB Matching Gift Program. When a UMB associate makes an eligible financial contribution to a qualified nonprofit organization, UMB will match it dollar-for-dollar up to $250 annually, per associate.

In 2021, 1,010 associates participated in the matching gift program, which is more than a quarter of the associate base. We also hold a company-wide workplace giving campaign each year so associates can support qualified nonprofits of their choice through recurring payroll deductions. We surpassed our participation goal with 32% of associates making pledges to contribute more than $525,590 to qualifying nonprofits of their choice.

In 2021, UMB’s combined total for donations was more than:

$6.6 million

Including $3 million to the UMBFC Charitable Foundation for future community support.
Financial Inclusion Services
In 2021, we expanded beyond our regulatory obligations to offer products and services to help drive financial inclusion:

- Launched online financial education portal, free and accessible to everyone
- Free checking account
- Secured credit card
- Developed a home equity line of credit express product, available in key markets
- Expanded mortgage subsidy products to support low-to-moderate income borrowers
- Launched a down payment assistance and grant program for first-time homebuyers
YOUTH PROGRAMS

School of Economics at UMB
School of Economics (SOE) is a nonprofit that provides interactive, educational experiences through curriculum-based field trips for nearly 20,000 Kansas City-area students each year. UMB leases nearly 4,000 square feet of space for $1 annually to SOE for its downtown location and provides a pipeline of eager volunteers.

UMB Market
The **UMB Market** is a grocery store simulation where young people practice healthy shopping on a budget. The exhibit, which is traditionally provided in tandem with the American Royal’s annual field trip, teaches children the value of money and its relationship to food. This helps participants build a solid foundation of personal finance basics, including weighing our needs versus our wants and creating and sticking to a budget.

During the pandemic, the American Royal’s annual field trip, including the UMB Market, transitioned to a virtual format, allowing kids to participate independently at home or together in a classroom. In 2021, the American Bankers Association recognized UMB as the **Financial Education winner within their Community Commitment Awards** for the UMB Market.
<table>
<thead>
<tr>
<th>School of Economics at UMB (one of two locations)</th>
<th>2020-2021**</th>
<th>2021-2022***</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total # Sessions</td>
<td>3</td>
<td>73</td>
</tr>
<tr>
<td>Total # of Unique Schools*</td>
<td>3</td>
<td>52</td>
</tr>
<tr>
<td>Total # of CRA-eligible schools</td>
<td>3</td>
<td>35</td>
</tr>
<tr>
<td>% CRA-Eligible Schools</td>
<td>100%</td>
<td>67%</td>
</tr>
<tr>
<td>Total # of student attendees</td>
<td>111</td>
<td>3,715</td>
</tr>
<tr>
<td>Total # of FRPL students</td>
<td>94</td>
<td>2,212</td>
</tr>
<tr>
<td>Total % of Free and Reduced-Price Lunch (FRPL) Student Attendees</td>
<td>85%</td>
<td>60%</td>
</tr>
<tr>
<td>Total # of UMB Volunteers</td>
<td>0</td>
<td>43</td>
</tr>
<tr>
<td>Total # of UMB Volunteer Hours</td>
<td>0</td>
<td>208</td>
</tr>
</tbody>
</table>

Totals above are based on current scheduled bookings.

* Many schools attend SOE over multiple days. This captures each unique school participating in SOE.

** Due to COVID pandemic, the program only operated summer school sessions for the 2020-2021 school year.

*** Due to COVID pandemic, the program will not have a full school year of operation in 2021-2022. Figures also include some projections based on current programing scheduled through May which is the end of the school year.
Associate Volunteering
UMB encourages our associates to give some of their time, energy and talents back to the community through spirited programs and initiatives. We proudly offer associates 16 hours of paid Volunteer Time Off (VTO) for volunteerism each year. In addition to individual volunteerism amongst our associates, specialized volunteer opportunities and team-building group projects are also offered to associates throughout the year.

Volunteering and VTO participation continued to be impacted by the COVID-19 pandemic in 2021. Nevertheless, hundreds of associates supported communities when and how they could while remaining safe and healthy.

2021 VTO Participation

427 associates
6,502 VTO hours logged
Environmental
UMB is dedicated to environmental conservation and responsible consumption of resources. We have a dedicated property management team who researches and reviews opportunities for space efficiency, energy efficiency, construction and renovation standards, and other ways we can reduce the environmental impact of our physical footprint.

Environmental Policy

UMB is committed to the best interest of our customers, our associates, and our communities. Because we care, we are dedicated to the sustainable stewardship of our natural resources in our decisions and actions.

We aspire to instill sustainable practices in ways that are measurable and transparent. Through demonstrated leadership, we aim to actively involve our associates and communities in support of environmental sustainability via engagement, community outreach, products/services, and internal practices. We adhere to applicable environmental laws and, where possible, look for opportunities to optimize our physical footprint.

Our commitments to continuous progress in environmental conservation and responsible stewardship include:

• Promoting and raising awareness internally and externally for essential stakeholder audiences to advance sustainable initiatives.
• Measuring, monitoring and reducing our environmental impact associated with our operations using energy efficient technologies, waste reduction programs and water conservation practices.
• Reporting annually to all stakeholders on UMB’s sustainability practices and progress in public disclosures.
Our Environment Goals

As part of our environmental focus, we have identified several goals we are working toward, starting in 2022. Just as markets and global needs shift, so, too, will these goals evolve and grow. Our current environmental objectives are:

- 5% reduction of owned and leased square footage within our existing real estate portfolio by year-end 2023
- Office space renovations to maintain and align with our 150 square feet per associate building standard
- Identify top 10% of Energy Star outliers within our properties and evaluate needs for improvement
- Building automation controls implemented in 100% of owned locations by year-end 2023
- Convert all high intensity discharge (HID) exterior lighting to 100% LED by year-end 2023
- Moving forward, any new branch construction will be built to LEED® standards
- Reduce printer paper use by 25% through print optimization and associate awareness by year-end 2023 (Print usage data will be compared to pre-pandemic, 2019 levels)
- Identify additional forms of paper reduction through current and digital opportunities, including account statements, marketing collateral, e-signatures, lending documents and deposit agreements
Efficient and Sensible Resource Use
UMB recognizes the undeniable importance of sustainable business practices—notably those in service to responsible and efficient resource use. While our business model as a financial service provider does not include production or distribution, we still examine ways to reduce waste, promote recycling, decrease air pollution, conserve energy and educate our associates about the benefits of environmental sustainability.

Property Management
We will continue to act as responsible stewards of our physical footprint. UMB operates with a banking presence in eight states and 91 branch locations, and has national services with teams and offices that extend across the U.S. We have a dedicated property management team that researches and reviews opportunities for space efficiency, energy efficiency, construction and renovation standards, and other ways we can add value to our customers and communities through our locations.

- 86 UMB locations were onboarded to an ENERGY STAR® rating system to measure and track energy, water and material waste
- 74 UMB buildings use automated systems designed to conserve energy
- Exterior lighting upgrades to LED saved more than 95K Kilowatt hours
- More than 183K Kilowatt hours generated from solar panels across UMB properties
- Internal programs including behavioral and technology improvements saved 608K Kilowatt hours
- Partnered with Free Range Beehives in Colorado to install beehives at a Denver branch to support the local honeybee population
Resource Reduction Policies and Practices
We are responsible stewards of our natural resources in our decisions and actions. Office work and financial accounts are well-known for their reliance on paper documentation. While we remain compliant with all applicable laws and regulations regarding account record keeping, we also take a close look at how we can reduce our use.

Green Commute
Employers like UMB continue to support telecommuting, remote work and technology, like video conferencing. UMB associates have a range of options that allow them to reduce the environmental impact of their daily commute, through public transit, walking, biking and working from home. UMB offers flexible spending accounts that can be used for commuting and an annual Green Commute Challenge through Rideshare KC to compete against other local companies and organizations.
Embracing Technology
Technology is a significant resource for reducing our paper use and commute impact. We empower associates to avoid printing by providing robust digital software in meeting rooms and workstations that enable teams to use screens to collaborate rather than paper documents. Additionally, we have enterprise-wide solutions adapted for mobile device access and laptop workstations so associates can check calendars, notes and documents on the go.

Green Partnerships
UMB is proud to be a partner in the Ripple Glass company, the first glass recycling program in the Kansas City region, and Bridging the Gap, a nonprofit providing environmental action and education.
Governance
### Board Composition

#### CORPORATE GOVERNANCE HIGHLIGHTS

<table>
<thead>
<tr>
<th>Board Composition</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Average age of directors</td>
<td>58 years</td>
</tr>
<tr>
<td>Female directors</td>
<td>3/12</td>
</tr>
<tr>
<td>Independent directors</td>
<td>10/12</td>
</tr>
<tr>
<td>Average tenure of independent directors</td>
<td>11 years</td>
</tr>
</tbody>
</table>

#### Best Practices
- Diverse skills and backgrounds among directors
- Board oversight of ESG
- Stock ownership guidelines for executive officers and directors
- Onboarding for new directors and continuing education for all

#### Independence
- Lead independent director with delineated responsibilities
- 100% independence on board committees

#### Accountability
- All directors elected annually
- Annual board and committee self-evaluation
- Annual evaluation of CEO by independent directors
- Claw-back policy

For more information on the skills and backgrounds of the UMB Board, please view our [2022 Proxy Statement](#).

AC = Audit Committee; CC = Compensation Committee; GC = Governance Committee; RC = Risk Committee
**Attendance Policy**
Our directors are expected to attend at least 75% of the aggregate meetings of the board and any committee on which the director serves. All directors are strongly encouraged to attend the annual meeting of shareholders.

**Selection Process**
We believe diversity among our directors enriches company decision-making and fosters robust, critical thinking. Our directors come from a variety of industries and backgrounds—but each of them has integrity, curiosity and a commitment to hard work.

UMB agrees that diversity plays an important role in a well-functioning Board, and we continue to evaluate diversity as an important factor in any director candidate. In recommending and nominating candidates, the following are minimum qualifications, and all director searches must include candidates that have gender and/or racial diversity:

- An individual of the highest character and integrity.
- An inquiring mind, vision, a willingness to ask hard questions, and the ability to work well with others.
- A personal and professional reputation consistent with the image and reputation of UMB.
- Free of any relationship or conflict of interest inconsistent with applicable law or that would interfere with the proper exercise of the fiduciary duties of a director.
- Willing and able to devote sufficient time and attention to the affairs of UMB and to diligently fulfill the responsibilities of a director.
- Capacity and desire to represent the balanced and best interests of the shareholders as a whole.

**ESG Governance**
We closely analyze how we do business through the lens of ESG considerations. We recognize that oversight of ESG issues helps minimize risks to our shareholders, and just as importantly, reinforces our core values. A primary function of our Governance Committee is to review UMB’s ESG practices and goals, and oversee the activities of the ESG Committee.

**The ESG Committee**
UMB evaluates its ESG performance on a continuous basis and voluntarily publishes ESG-related information. Execution of UMB’s ESG strategy is overseen by UMB’s ESG Committee, which is not a board committee. The ESG Committee is chaired by our chief administrative officer and is comprised of senior officers of UMB or its subsidiaries.

The ESG Committee supports the Governance Committee and the board in establishing strategy, policies and practices, and public disclosures related to environmental, health and safety, corporate social responsibility, corporate governance and sustainability. The ESG Committee provides regular reports to the Governance Committee on ESG activities and risks.
Risk Oversight
Among the board’s specific responsibilities is oversight of the risk management policies of UMB’s global operations and the operation of UMB’s global risk-management framework. We have the following committees in place:

• The risk committee is comprised of independent directors and is charged with approving and periodically reviewing the risk management policies of our global operations, including statements of risk appetite, and adapting the enterprise risk management policy when and as appropriate to changes in our structure, risk profile, complexity, activities or size.
  - The enterprise risk committee manages our operational risk.
  - The asset and liability committee assists in the oversight of balance sheet management risks related to liquidity, interest rates and capital markets, or similar risk management practices, and our capital positions.
  - The credit committee assists in the oversight of the credit and counterparty risk management.
Business Ethics

**SASB: FN-CB-510a.1**
Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behavior, market manipulation, malpractice, or other related financial industry laws or regulations.

**LEGAL PROCEEDINGS STATUS**

To the extent that UMB has material legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behavior, market manipulation, malpractice or other related financial industry laws or regulations, those would be reported on Form 10-K. UMB did not report any material losses related to legal proceedings in 2021.

**SASB: FN-CB-510a.2**
Description of whistleblower policies and procedures.

**BUSINESS ETHICS PROGRAMS**

**Code of Ethics**

We believe integrity is paramount. While all business is based to some degree on trust, UMB has trust as a core principle. Being honest and fair to customers, shareholders and associates is not just a value but a moral imperative. In keeping with these principles, UMB has adopted a Code of Ethics that covers several areas, including honesty and fair competition, confidentiality, insider trading, conflicts of interest, gifts and gratuities, political activities, and compliance with laws and regulations.

The Code of Ethics was adopted to not only ensure compliance with applicable laws, but also to establish standards that transcend those minimum requirements and create a culture of honest and ethical conduct.

To read our Code of Ethics in full, please visit [InvestorRelations.UMB.com/GovDocs](https://InvestorRelations.UMB.com/GovDocs).
Complaints and Internal Investigations
UMB has also adopted a Complaint and Internal Investigations Policy that establishes a system for the anonymous reporting of potential violations of the UMB Code of Ethics, applicable laws and regulations, and other complaints including discrimination and harassment to an independent third party through a hotline or via a secure website.

Every complaint filed through the reporting system is automatically forwarded to the audit committee chairperson, the chief risk officer, and the chief audit officer who will then direct the complaints to the appropriate parties for review and possible investigation.

UMB strictly prohibits and does not tolerate retaliation against any person making a complaint under the policy for any activity that the person reasonably and in good faith believes is a reportable offense.

Anti-Bribery and Anti-Corruption
UMB has also adopted an Anti-Bribery and Anti-Corruption Policy which are applicable to all UMB associates and directors.

All UMB associates are required to complete the annual corporate integrity training that provides an overview of business and personal ethics and describes how to report violations and whistleblowing. For 2021, 100% of associates completed the required training.

Additionally, UMB officers complete an annual questionnaire used to identify potential conflicts of interest, unethical conduct or violations of the Code of Ethics or company policies. The UMB corporate compliance program provides for the investigation and reporting of potential violations.

BSA/AML Policies
UMB’s BSA/AML policy is reviewed and approved annually by the board of directors. We provide attestations of compliance with the USA PATRIOT Act and the Bank Secrecy Act to other financial institutions when requested.

The BSA function is audited annually by the Internal Audit Department and examined annually by the Office of the Comptroller of the Currency. Additionally, the BSA officer presents an annual update to the Enterprise Risk Committee as well as the Risk Committee of the board of directors.
Data Privacy and Security

SASB: FN-CB-230a.2

Description of approach to identifying and addressing data security risks.

Information security is an important part of our commitment to our clients and a foundational aspect of delivering safe, secure, and quality products and services. This belief is embedded in our culture and emphasized throughout the organization by our board of directors, senior leaders, officers, managers, and associates.

UMB assesses vulnerabilities in information systems from two perspectives: a threat-oriented risk assessment that identifies both controls and vulnerabilities, and the scanning of all external and internal systems to identify software vulnerabilities. All processes are governed by policies, procedures, and standards.

We have an Incident Response Plan in place that defines our process to assess the impact of an incident (i.e., type and quantify of data impacted) and processes to notify impacted parties. Our notification procedures are aligned with regulatory requirements such as the Gramm-Leach-Bliley Act (GLBA), state privacy regulations, and contractual agreements. Our Information Security Incident Response Team is a cross functional team that includes risk, technology, privacy and legal expertise. The team works with the line of business and customer relationship managers to notify customers.

UMB assesses emerging cyber threats and attack vectors via multiple processes. Threat intelligence monitors attacks and breaches associated with financial institutions and key third-party service providers. The attacks are assessed to understand any exposure to UMB and if they represent an emerging threat. UMB operates within the highly regulated financial services industry, which is focused on the confidentiality, integrity and availability of information and information systems.

The GLBA and the corresponding Federal Financial Institution Examination Council (FFIEC) standards outline specific requirements for financial services companies.

UMB has established more than 20 information security policies focused on ensuring confidentiality, integrity and availability of information for our customers and have implemented technology standards that align with the policy requirements. Our policies and standards are compliant with GLBA and FFIEC guidance.

We have periodic surveillance by the OCC, and a cadence of regular audits and penetration testing is completed both internally and externally by a number of vendors on an ongoing basis.
Associate Privacy and Security Training

Internal security training is completed annually for all UMB associates. Phishing exercises are completed bi-monthly for all UMB associates, and after-action education is sent out to discuss each test. Additional training is provided to those who fail a certain number of tests. Team or access specific trainings are conducted each year for topics such as incident response, email controls, conducting investigations and other topics. Departments also have their own budgets for training on new technologies, attending industry meetings, or attending external trainings and conferences.

Additionally, the privacy function conducts targeted, role-based training where necessary to support compliance with applicable law or the organizational privacy policy.

Other one-off assessments, such as cloud audits and cybersecurity reviews, are completed periodically. Oversight and execution of data security is completed with a first, second and third line of defense approach.

All monitoring and reporting is managed by the Information Technology Steering Committee, which is a sub-committee of the Enterprise Risk Committee, ultimately reporting to the Board Risk Committee.

Ensuring Privacy Protections

We provide opt-out, access and erasure rights, among others, to individuals as required by applicable law. UMB maintains processes and infrastructure to identify and track such requests and to help support the exercise of such rights.

UMB is committed to its data protection standards which are governed by our privacy policy. We maintain robust third-party management and records retention programs to ensure data is kept confidential and only used for legally permissible purposes.

UMB’s third-party management policies and processes fold in various controls (e.g., such as contractual data use restrictions and information security controls) related to third parties with whom UMB shares personal data, such as customer and associate data. These controls are implemented to ensure such data is kept confidential and only used for legally permissible purposes.

Additionally, the privacy function maintains a regulatory monitoring process designed to keep the organization current on developments in privacy laws and frameworks and an incident response program to manage the notification process for individuals in the event of a breach.

Responsibility for the privacy function falls under the chief information security officer, who also holds the title of chief privacy officer. This individual reports regularly to the Risk Committee of the board of directors.

Vendor Ethical Business Practices

Just as we have expectations and standards for our associates and leaders, so too do we expect our suppliers and vendors to operate with integrity. Beyond adhering to all applicable laws and regulations, we also expect vendors to operate with ethical business practices. These include but are not limited to: applicable labor laws and regulations, labor and human rights, discrimination, humane treatment and providing a safe work environment.
Risk Management

Systemic Risk Management

**SASB: FN-CB-550a.2**

Description of approach to incorporation of results of mandatory and voluntary stress tests into capital adequacy planning, long-term corporate strategy, and other business activities.

UMB uses stress testing results in establishing our capital ratio policy minimums and baseline targets. These results influence our loan growth, balance sheet size, M&A, dividend, and share repurchase strategies.

UMB has implemented a comprehensive information security and privacy program inclusive of administrative, physical, and technology safeguards to protect customer money and information, uphold privacy rights, and maintain a secure and resilient business. The program also continues to mature and evolve to support changes in our business, technology and regulatory obligations, and defend against a constantly evolving threat landscape.

We have periodic surveillance by the OCC, and regular audits and penetration testing is completed both internally and externally by a number of vendors on an ongoing basis. We also monitor and manage security scores published by independent third parties using publicly available data to ensure their information about UMB is accurate and any identified risks are effectively managed.
Global Systemically Important Bank (G-SIB) score, by category

**SASB: FN-CB-550a.1**

UMB Financial is not a G-SIB.

**Disaster Recovery and Business Continuity**

UMB maintains a well-developed recovery program, including both business resumption and disaster recovery capabilities. Our recovery plans, under the umbrella of a master continuity plan, include both disaster recovery runbooks and business unit continuity plans that are tested regularly. These plans encompass life safety, technological recovery, processing recovery, incident management and crisis communication. Our plans are designed to respond to likely event categories, such as weather, technology disruptions (both internal and external), facility events, staffing events (including pandemics) and civil unrest.
Our delivery is consistent, our loan portfolio is diversified and our values are strong. You won’t see us chasing trends, and you can count on us to always do what’s right. These principles have set us apart from our competition for more than a century—and will continue to do so in the future.

<table>
<thead>
<tr>
<th>Financial Summary</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>As of December 31, 2021</strong></td>
</tr>
<tr>
<td>Total Annual Revenue</td>
</tr>
<tr>
<td>Dividend Growth* (FY 2002 - FY 2021)</td>
</tr>
<tr>
<td>NASDAQ</td>
</tr>
<tr>
<td>Market Cap</td>
</tr>
<tr>
<td>Years in Business</td>
</tr>
<tr>
<td>UMB Financial Corporation</td>
</tr>
<tr>
<td>Total Assets</td>
</tr>
<tr>
<td>Branches</td>
</tr>
<tr>
<td>Number of Associates</td>
</tr>
</tbody>
</table>

*Represents growth in annual dividends declared.
## Sustainability Accounting Standards Board (SASB) Index

<table>
<thead>
<tr>
<th>SASB: FN-CB-230a.2</th>
<th>Description of approach to identifying and addressing data security risks</th>
</tr>
</thead>
<tbody>
<tr>
<td>SASB: FN-CB-240a.1</td>
<td>Number and amount of loans outstanding qualified to programs designed to promote small business and community development</td>
</tr>
<tr>
<td>SASB: FN-CB-240a.2</td>
<td>Number and amount of past due and nonaccrual loans qualified to programs designed to promote small business and community development</td>
</tr>
<tr>
<td>SASB: FN-CB-410a.1</td>
<td>Commercial and industrial credit exposure, by industry</td>
</tr>
<tr>
<td>SASB: FN-CB-410a.2</td>
<td>Description of approach to incorporation of environmental, social, and governance (ESG) factors in credit analysis</td>
</tr>
<tr>
<td>SASB: FN-CB-510a.1</td>
<td>Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behavior, market manipulation, malpractice, or other related financial industry laws or regulations</td>
</tr>
<tr>
<td>SASB: FN-CB-510a.2</td>
<td>Description of whistleblower policies and procedures</td>
</tr>
<tr>
<td>SASB: FN-CB-550a.1</td>
<td>Global Systemically Important Bank (G-SIB) score, by category</td>
</tr>
<tr>
<td>SASB: FN-CB-550a.2</td>
<td>Description of approach to incorporation of results of mandatory and voluntary stress tests into capital adequacy planning, long-term corporate strategy, and other business activities</td>
</tr>
</tbody>
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