



PUBLIC DISCLOSURE

November 29, 2021

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

Superior National Bank
Charter Number 9087

235 Quincy Street
Hancock, MI 49930

Office of the Comptroller of the Currency

Milwaukee Field Office
1200 North Mayfair Rd, Suite 200
Wauwatosa, WI 53226

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 loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, and the credit needs of its assessment area (AA).
- A substantial majority of loan originations are made within the bank's AA.
- The borrower distribution of home mortgage loans among borrowers of different incomes and small loans to businesses of different sizes are considered reasonable.
- The geographic distribution of home mortgage loans and small business loans reflects reasonable distribution among geographies.
- The bank demonstrated good responsiveness to CD needs by engaging in a combination of CD loans, qualified investments, and CD services.

Loan-to-Deposit Ratio

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

The bank's quarterly LTD ratio averaged 61.21 percent, ranging from 51.51 percent to 71.27 percent, over the 13 quarters from September 30, 2018 through September 30, 2021. The bank ranks third in its peer group that includes five other similarly situated banks with LTD ratios ranging from 31.57 percent to 75.16 percent. The peer groups consist of banks with assets ranging from \$62.3 million to \$538.8 million.

Lending in Assessment Area

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

The bank originated or purchased 95.8 percent of its total loans by number and 92.0 percent by dollar amount inside its AA 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. See the chart below for additional detail.

Table D - Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2018	25	100.0	0	0.0	25	2,069	100.0	0	0.0	2,069
2019	22	95.7	1	4.4	23	1,641	97.1	49	2.9	1,690
2020	25	100.0	0	0.0	25	2,036	100.0	0	0.0	2,036
Subtotal	72	98.6%	1	1.4%	73	5,746	99.2%	49	0.8%	5,795
Small Business										
2018	20	90.9	2	9.1	22	2,409	72.5	915	27.5	3,324
2019	24	100.0	0	0.0	24	2,287	100.0	0	0.0	2,287
2020	21	80.8	3	11.5	24	4,052	93.3	290	6.9	4,342
Subtotal	65	92.9%	5	7.1%	70	8,748	87.9%	1,205	12.1%	9,953
Total	137	95.8%	6	4.2%	143	14,494	92.0%	1,254	8.0%	15,748
<i>Source: Evaluation Period: 01/01/2018 - 12/31/2020 Bank Data Due to rounding, totals may not equal 100.0</i>										

Description of Institution

Superior National Bank (SNB) is a federally chartered bank headquartered in Hancock, Michigan. The bank is 100 percent owned by Keweenaw Financial Corporation, a one-banking holding company also headquartered in Hancock, Michigan. SNB is a full-service financial institution, offering traditional commercial and retail bank products and services and trust and investment services. As of September 30, 2021, SNB had \$1.05 billion in total assets, a loan portfolio of \$623 million, and tier 1 capital of \$95.4 million. The loan portfolio represents 59.3 percent of total assets and is comprised of 55.4 percent commercial loans, 36.6 percent residential real estate loans, and 8.0 percent consumer loans. In February 2021, the bank merged with Main Street Bank (MSB) increasing total assets from \$666 million as of year-end 2020 to \$994 million as of March 31, 2021.

The bank operated eight full-service branches in addition to the main office during the evaluation period, all of which are located in the Upper Peninsula of Michigan. The bank has six branches, including the main office, that are in middle-income CTs that have been designated as underserved or distressed. The remaining two branches are located in upper-income CTs. No branches were opened or closed during the evaluation period. All of the bank's branches have Automated Teller Machines (ATMs), and another four SNB ATMs are located at non-branch locations within local grocery stores, one of which is in a moderate-income CT. As part of the MSB merger, the bank added two branches, two home loan centers, and no ATMs in lower Michigan. These additional locations are not considered in this assessment as the merger transaction occurred outside of the evaluation period for the Lending and CD Tests but will be included as part of the next CRA performance evaluation.

There are no legal or financial factors impeding the bank's ability to help meet the credit needs of its AA. SNB was evaluated using the Intermediate Small Bank Procedures and received a Satisfactory rating at the prior CRA examination dated October 1, 2018.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated SNB's performance under the Intermediate Small Bank Lending and CD Tests. The Lending Test assesses the bank's record of meeting the credit needs of its AA through lending activities. The CD Test evaluates the bank's responsiveness to CD needs in its AA through CD lending, qualified investments, and services. We reviewed data for the bank's primary loan products, small business loans and home mortgage loans, to evaluate the bank's lending performance.

This evaluation covers the period since the prior CRA examination, October 1, 2018 through November 29, 2021. The Lending Test evaluated loans originated between January 1, 2018 and December 31, 2020. The CD Test covered CD loans, investments, and services between the same January 1, 2018 and December 31, 2020 period.

To evaluate residential real estate and small business lending, we used data from bank reports and a random sample of loans for each primary loan product originated or purchased in the bank's AA. Our lending analysis utilized the most recent available demographic and aggregate peer lending data.

We reviewed the bank's CD loans, investments, and services based on information provided by the bank. We included only those loans, investments, and services that met the regulatory definition for CD in our CD Test analysis.

The federal banking agencies are now updating decennial census data every five years, beginning with the Census Bureau's 2015 American Community Survey (ACS). This change was implemented in order to provide more current and accurate demographic data. During the current evaluation period, SNB's AA was not affected by this change, and the lending data from 2018 through 2020 received the same analysis based on the 2015 ASC. Data is discussed in the applicable narrative sections of this evaluation.

Selection of Areas for Full-Scope Review

Given the bank only has one AA, we reviewed this non-MSA AA using full-scope procedures.

Ratings

The bank's overall rating is based primarily on those areas that receive full-scope reviews.

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 Michigan

CRA rating for the State of Michigan: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- A substantial amount of loan originations are made within the bank's AA.
- The borrower distribution of home mortgage loans reflects reasonable distribution among borrowers of different incomes. The borrower distribution of small loans to businesses reflects reasonable distribution among businesses of different sizes.
- The geographic distribution of home mortgage loans reflects reasonable distribution among geographies. The geographic distribution of small loans to businesses reflects reasonable distribution among geographies.
- The bank's CD performance through CD loans, qualified investments, and services demonstrates reasonable responsiveness to CD needs in the AA.

Description of Institution's Operations in Michigan

The bank has one AA located entirely in the Upper Peninsula of Michigan. The AA does not lie within an MSA. The AA includes all of Baraga, Houghton, Keweenaw, and Ontonagon counties. The AA complies with regulatory requirements and does not arbitrarily exclude any LMI geographies.

According to the Census Bureau's 2015 ACS, the bank's AA is comprised of 22 CTs, of which zero are low income, four (18.18 percent) are moderate-income, 10 (45.45 percent) are middle-income, two (9.09 percent) are upper-income, and six (27.27 percent) are designated NA. According to the FFIEC's June 1, 2020 list, five CTs in the bank's AA were designated as "Distressed or Underserved Middle-Income Nonmetropolitan Tracts" during the evaluation period. This includes two CTs in Baraga County designed as distressed and underserved due to unemployment and remote rural location; one CT in Keweenaw County designated as distressed due to unemployment; and two CTs in Ontonagon County designated as distressed and underserved due to unemployment, population loss, and remote rural location.

The total population of the AA is 53,846, which is comprised of 12,231 families. The number of families at each income level is: 2,497 low-income (20.42 percent), 2,403 moderate-income (19.65 percent), 2,565 middle income (20.97 percent), and 4,766 upper-income (38.97 percent). The average median family income is \$52,063, and the FFIEC 2020 updated MSA median family income is \$60,900. The percentage of families below the poverty level is 11.1 percent. Owner-occupied units comprise 48.50 percent of total housing units. Based on 2020 demographic data, the total number of businesses with reported revenues in the AA was 3,234. Of these businesses, 2,590 (80.1 percent) had gross

revenues of \$1.0 million or less, 171 (5.3 percent) had gross revenues of greater than \$1.0 million, and 473 (14.6 percent) businesses did not report revenue.

According to the FDIC Deposit Market Share Report as of June 30, 2021, there is moderate competition within the AA. SNB ranks first in total deposits, ahead of Incredible Bank and Range Bank, which are second and third, respectively. Overall, the bank has a market share of 55.80 percent. The balance of the market share is divided among seven other financial institutions, ranging from 3.88 percent to 10.72 percent.

Employment and Economic Factors

Houghton county has a diverse work force and the most common industries by number of employees include educational services, health care and social assistance, and retail trade. In addition, Houghton County has an unusually high number of educational services, recreational businesses, housing, and food services compared to other Michigan counties. Major employers include the Aspirus Keweenaw, UP Health System – Portage, Michigan Tech University, and the Keweenaw Bay Tribal Community.

Due to the COVID-19 pandemic, there is a tremendous need for employment in various industries which is causing businesses to be short-staffed in comparison to the increase in tourism and people moving to the area. The influx of people moving to the area has put pressure on the housing stock, but affordable housing and business development opportunities remain in the area. The December 2020 annual unemployment rate for Baraga, Houghton, Keweenaw, and Ontonagon counties were 9.3 percent, 5.9 percent, 8.2 percent, and 8.4 percent, respectively, while the annual unemployment rate for the state of Michigan was 8.3 percent.

Community Contact

Overall, the credit needs of the community are being identified and addressed. We performed one community contact with an economic development organization serving the AA. The contact stated that even with the COVID-19 pandemic, Keweenaw and surrounding areas within the AA are thriving. Business are short staffed and overwhelmed by the increase in tourism and people moving to the area during this time and if businesses did not close due to the pandemic, they remain open and operating successfully.

Assessment Area: Superior Non-MSA AA 2020						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	22	0.0	18.2	45.5	9.1	27.3
Population by Geography	53,846	0.0	27.3	56.1	16.6	0.0
Housing Units by Geography	31,963	0.0	22.1	64.7	12.9	0.4
Owner-Occupied Units by Geography	15,502	0.0	21.7	62.3	16.0	0.0
Occupied Rental Units by Geography	5,361	0.0	41.7	38.7	19.4	0.1
Vacant Units by Geography	11,100	0.0	13.0	80.5	5.4	1.0
Businesses by Geography	3,234	0.0	28.8	51.4	19.9	0.0
Farms by Geography	136	0.0	14.7	78.7	6.6	0.0
Family Distribution by Income Level	12,231	20.4	19.6	21.0	39.0	0.0
Household Distribution by Income Level	20,863	28.1	18.6	17.5	35.7	0.0
Median Family Income Non-MSAs - MI		\$53,628	Median Housing Value			\$93,896
			Median Gross Rent			\$612
			Families Below Poverty Level			11.1%
<i>Source: 2015 ACS and 2020 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Michigan

The Michigan state rating is based on the results of the Superior Non-MSA AA. Since this AA is the only AA and received a full-scope review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MICHIGAN

LENDING TEST

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

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

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to table O in the state of Michigan section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans reflects reasonable distribution among geographies. There are no low-income CTs in the AA. The bank originated 11.4 percent of home mortgage loans in moderate-income geographies. The percentage of the bank's originated loans is below the demographics that show 21.7 percent of owner-occupied housing is in moderate-income geographies. The percentage of bank originated loans is also less than the aggregate peer lending data, which shows 15.6 percent of home mortgage lending was in moderate-income geographies.

Small Loans to Businesses

Refer to table Q in the state of Michigan section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of business loans reflects reasonable distribution among geographies. There are no low-income CTs in the AA. The bank originated 13.8 percent of business loans in moderate-income geographies. The percent of the bank's originated loans is below the demographics that indicate 28.8 percent of AA businesses are in moderate-income geographies. The percentage of bank originated loans is also less than the aggregate peer lending data in moderate-income geographies of 23.0 percent.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained conspicuous gaps existed. We reviewed summary reports, maps, and analyzed SNB's home mortgages and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. There were no other 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.

Home Mortgage Loans

Refer to table P in the state of Michigan section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The borrower distribution of home mortgage loans within the AA reflects reasonable distribution among borrowers of different incomes. The bank originated 6.9 percent of its home mortgages to low-income families. This percentage is less than the demographics that indicate 20.4 percent of families in the AA are low-income. The percentage of bank loans to low-income families exceeds the aggregate peer lending data, which show 4.4 percent of peer lending within the AA was to low-income families. The bank originated 30.6 percent of home mortgages to moderate-income families, which exceeds the demographics that show 19.6 percent of families in the AA are moderate-income. The bank's lending also exceeds the aggregate peer lending data, which show 15.1 percent of peer lending within the AA was to moderate-income families.

Small Loans to Businesses

Refer to table R in the state of Michigan section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The borrower distribution of loans reflects excellent distribution amount businesses of different sizes. The bank originated 89.2 percent of its business loans to AA small businesses (businesses with gross annual revenues of \$1.0 million or less). This percentage of loans to small businesses exceeds the percentage of small businesses in the AA, which is 80.1 percent of total businesses. The percentage of bank loans to small businesses also exceeds the aggregate lending data which shows 48.8 percent of peer business lending in the AA was to small businesses.

Responses to Complaints

The bank demonstrated adequate responsiveness to complaints. There were no consumer complaints regarding the bank’s CRA performance or complaints indicating illegal or discriminatory lending practices during the evaluation period.

COMMUNITY DEVELOPMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Community Development Loans

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

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000’s)	% of Total \$
Superior Non-MSA	77	100%	13,046	100%

SNB’s CD lending reflects excellent responsiveness to identifying and addressing the credit needs in the bank’s AA.

During the evaluation period, the bank originated or renewed 77 loans for a total of \$13 million within the bank’s AA. The majority of the bank’s CD loans are to tribal entities, educational funds/districts, townships, and shelters for victims of domestic violence. A few notable examples include:

- Issued \$5 million in CD eligible Paycheck Protection Program loans to 10 different businesses operating and assisting LMI individuals during the COVID-19 pandemic.
- A \$3.25 million loan to a tribal entity to assist with tribal operations that benefit tribal LMI individuals.
- A \$1.4 million loan to an area public school system for operating expenses and assistance to LMI individuals.
- Two loans, one for \$88 thousand and another for \$9.6 thousand, to benefit veterans through various assistance programs.

- Two loans, one for \$40 thousand and another for \$50 thousand, to shelters that aid LMI individuals and help them escape violence and find safe housing.

In addition to the normal CD loan activity, the AA experienced a FEMA major flood disaster declaration during the evaluation period, to which SNB offered a loan for up to \$10 thousand for 60-months, at a reduced rate of 1.99 percent for those who were impacted. Overall, the bank lent a total of \$400 thousand to 48 local residents and businesses as part of this community initiative.

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. These tables include all CD investment, including prior period investments that remain outstanding as of the examination date.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Superior Non-MSA	22	7,070	6	1,665	28	100%	8,735	100%	0	0

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

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

The level of qualified community development investments is adequate, totaling \$1.66 million during the review period.

Additionally, the bank made 16 donations for a total of \$19,275 to groups and organizations within the AA during the review period. These organizations cover a variety of needs in the AA, such as economic development of local and small businesses, scholarship funds for LMI individuals, and shelters for LMI women and children. While not a comprehensive list, below are a few notable donations.

- One donation of \$15,000 to the Keweenaw Economic Development Alliance provided businesses in the AA with 150 COVID-19 business reopening kits. These kits helped local businesses that may not have been able to afford key sanitation devices and products by providing kits of items to aid in safe reopening.
- Charitable donations totaling \$600 were provided to two domestic shelters in Houghton and Baraga Counties.

Extent to Which the Bank Provides Community Development Services

SNB provides a reasonable level of community development services through its branches, products, and activities with local organizations that support many activities that directly benefit LMI populations. The bank operates one branch located in a moderate-income CT in Calumet, Michigan. There is also an offsite ATM, which is located in a moderate-income CT in Calumet, Michigan. The bank provides affordable banking services in its AA.

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

During the evaluation period, eight SNB employees provided technical assistance and financial expertise to nine CD organizations serving the bank's AA. These organizations address AA needs of affordable housing, economic and business development, and educational development for LMI individuals. While not a comprehensive list, below are some highlights that demonstrate the type of activity bank employees participated in:

- Three bank employees worked with the Copper County Habitat for Humanity as president, treasurer, and assistant treasurer, as well as board membership, for a total of 1,776 hours of volunteer time between 2018 and 2020.
- Three employees worked with the Adams Township, L'Anse, and Hancock Public School Foundations as president, director, and trustee. These employees provided expertise for a total of 130 hours.
- Two employees worked with the Baraga and Keweenaw chambers of commerce, one as a director and the other as the president. Both chamber of commerce positions utilized bank employee expertise to help retain and develop business in the Baraga and Keweenaw areas.

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:	January 1, 2018 through December 31, 2020	
Bank Products Reviewed:	Home mortgage, small business, community development loans, qualified investments, community development services.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None.		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Non-MSA	Full-scope	All of Baraga, Houghton, Keweenaw, and Ontonagon counties.

Appendix B: Summary of MMSA and State Ratings

RATINGS Superior National Bank			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Superior National Bank	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/assessment area.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- 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.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-,

and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2018-20
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Superior Non-MSA AA 2020	72	5,745	100.0	1,259	0.0	0.0	0.0	21.7	11.4	15.6	62.3	75.7	60.7	16.0	12.9	23.7	0.0	0.0	0.0	
Total	72	5,745	0.0	1,259	0.0	0.0	0.0	21.7	11.4	15.6	62.3	75.7	60.7	16.0	12.9	23.7	0.0	0.0	0.0	

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2018-20
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Superior Non MSA AA 2020	72	5,745	100	1,259	20.4	6.9	4.4	19.6	30.6	15.1	21.0	30.6	23.4	39.0	31.9	46.5	0.0	--	10.6	
Total	72	5,745	100	1,259	20.4	6.9	4.4	19.6	30.6	15.1	21.0	30.6	23.4	39.0	31.9	46.5	0.0	--	10.6	

*Source: 2015 ACS Census ; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA 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																				2018-20

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Superior Non-MSA AA 2020	65	8,748	100	596	0.0	0	0.0	28.8	13.8	23.0	51.4	64.6	51.7	19.9	21.5	25.3	0.0	0	0.0
Total	65	8,748	100	596	0.0	0	0.0	28.8	13.8	23.0	51.4	64.6	51.7	19.9	21.5	25.3	0.0	0	0.0

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Superior Non-MSA AA 2020	58	6,235	100	596	80.1	89.2	48.8	5.3	10.8	14.6	0
Total	58	6,235	100	596	80.1	89.2	48.8	5.3	10.8	14.6	0

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%