



PUBLIC DISCLOSURE

January 9, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Eaton Community Bank
Charter Number 704194

236 S Cochran Avenue
Charlotte, MI 48813-1551

Office of the Comptroller of the Currency

200 Public Square Suite 1610
Cleveland, OH 44114-2301

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.

Table of Contents

Overall CRA Rating.....	1
Description of Institution.....	2
Scope of the Evaluation.....	3
Discriminatory or Other Illegal Credit Practices Review.....	5
State Rating.....	6
State of Michigan.....	6
Appendix A: Scope of Examination.....	A-1
Appendix B: Summary of MMSA and State Ratings.....	B-1
Appendix C: Definitions and Common Abbreviations.....	C-1
Appendix D: Tables of Performance Data.....	D-1

Overall CRA Rating

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

The lending test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on the reasonable distribution of home mortgage loans among borrowers of different incomes and a reasonable geographic distribution of home mortgages.
- A majority of the bank's loans are inside its assessment areas (AAs).
- The bank's loan-to-deposit (LTD) ratio is reasonable.

Loan-to-Deposit Ratio

Considering Eaton Community Bank's (ECB or bank) size, financial condition, and credit needs of the AA(s), the bank's LTD ratio is reasonable.

ECB's LTD ratio is calculated on a bank-wide basis and meets the standard for satisfactory performance. The OCC evaluated ECB's quarterly LTD ratios for the period January 1, 2018, to September 30, 2022. Overall, when comparing ECB's LTD ratios to four similar situated banks located in Ingham and Barry Counties, they are lower.

The bank's average LTD ratio during the evaluation period was 69.1 percent, and quarterly ratios ranged from a high of 84.1 percent to a low of 50.1 percent. The OCC compared ECB's LTD ratio to the four similarly situated banks with assets between \$206.6 million and \$4.2 billion. The average LTD ratio for these banks ranged from 72.5 percent to 142.0 percent.

ECB also sells a majority of its home mortgage loans to secondary market investors. Compared to the two banks closest in asset size, ECB's quarterly averages are comparable. The two closest banks in asset size, \$206.6 million and \$429.1 million, the quarterly average ratios were 86.2 and 72.5 percent respectively, and were comparable with ECB's 69.1 percent quarterly average ratio.

Lending in Assessment Area

A majority of the bank's loans are inside its assessment areas (AAs).

The bank originated and purchased 65.6 percent by number and 60.0 percent by dollar amount of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

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										
2019	111	71.6	44	28.4	155	16,370	64.6	8,954	35.4	25,324
2020	186	63.3	108	36.7	294	28,922	55.3	23,398	44.7	52,320
2021	144	64.6	79	35.4	223	24,209	63.3	14,036	36.7	38,244
Subtotal	441	65.6	231	34.4	672	69,500	60.0	46,388	40.0	115,888
Total	441	65.6	231	34.4	672	69,500	60.0	46,388	40.0	115,888
<i>Source: Bank Data Due to rounding, totals may not equal 100.0%</i>										

Description of Institution

Eaton Community Bank is headquartered in Charlotte, Michigan. The bank reorganized into a mutual holding company structure in 2020. A mutually owned holding company, Eaton Federal Mutual Holding Company, is the sole owner of a stock holding company, which is the sole owner of the bank. At the time of the reorganization, the bank also changed its name from Eaton Federal Savings Bank to Eaton Community Bank. The bank has one subsidiary, Discovery Financial Services Corporation, that currently does not have any assets but is a legal entity under the bank. The bank's operations are focused within the counties of Eaton, Ingham, Clinton, Barry, and Livingston. As of December 31, 2021, the bank's assets totaled \$436.9 million, and tier one capital totaled \$55.9 million, or 12.8 percent of total assets.

ECB had three AAs during the evaluation period, Eaton AA, Barry AA, and Livingston AA. The Eaton County AA consists of Eaton County in its entirety, as well as adjacent census tracts (CTs) located in Clinton and Ingham Counties. Eaton AA contains 39 CTs and it is part of the Lansing-East Lansing, MI Metropolitan Statistical Area (MSA) and is the bank's primary AA. The Barry County AA consists of two CTs that are adjacent to the Eaton County AA. This AA contains the bank's Nashville branch, and is part of the Grand Rapids-Wyoming, MI MSA. The Livingston AA contained two CTs and is part of the Warren-Try-Farmington Hills MSA. The only branch in the AA, the Gregory branch, was closed, effective July 30, 2021. The AAs comply with regulatory requirements and do not arbitrarily exclude any low- or moderate-income geographies. No branches were opened, and one branch was closed since the last CRA evaluation.

The bank's primary loan products are residential real estate loans. During the evaluation period, the bank's loan portfolio decreased 18.6 percent to \$183.3 million. As of December 31, 2021, the loan portfolio was comprised of residential real estate loans (\$99.1 million or 54.1 percent), non-farm or non-residential loans (\$57.6 million or 31.5 percent), multifamily loans (\$1.9 million or 1.0 percent), commercial and industrial loans (\$8.4 million or 4.6 percent), consumer loans (\$9.0 million or 4.9 percent), construction loans (\$5.7 million or 3.1 percent), farmland loans (\$1.0 million or 0.6 percent), agriculture loans (\$446,000 or 0.2 percent), and loan to non-depository financial institutions (\$42,000 or 0.02 percent).

Based on Federal Deposit Insurance Corporation (FDIC) Deposit Market Share reports from June 30, 2018, and June 30, 2021, deposits at the bank have increased from \$223 million to \$344 million.

ECB offers traditional home loan products, including home mortgage loans, home improvement loans, home equity loans, HELOCs, and home construction loans. The bank also offers personal loans. The bank's consumer deposit-related products and services include checking, savings, and money market accounts, certificates of deposit, individual retirement accounts (IRA), online bill pay, mobile banking, overdraft protection, safe deposit boxes, ATM services, and wire transfers. Business-related deposit products and services include checking and savings accounts, cash management, business online and mobile banking. Business loans include real estate loans, term and equipment loans, lines of credit, and Small Business Administration (SBA) loans.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs of the AA. The bank received a "Satisfactory" rating on their previous CRA performance evaluation dated April 29, 2019.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assesses ECB's record of meeting the credit needs of its AA. The OCC performed this review using Small Bank CRA procedures. The Lending Test evaluates the bank's record of meeting the credit needs of its AAs through lending activities and uses home mortgage loans reported by the bank under the Home Mortgage Disclosure Act (HMDA). The evaluation period for lending activity is from January 1, 2019, to December 31, 2021.

Based on the bank's internal reports and discussions with management, examiners determined that the bank's primary lending products during the evaluation period were home mortgages loans. Examiners used other supporting information during the evaluation, including the 2015 American Community Survey (ACS) data, internal bank records, deposit market share data, and information from governmental websites regarding the characteristics and economy of the bank's AA. Examiners also considered information from a community contact to help assess the needs of the bank's AA.

Selection of Areas for Full-Scope Review

All of the bank's AAs are in the state of Michigan. The OCC selected ECB's Eaton AA for a full-scope review. The AAs contain the majority of the bank's branches and provides most of its deposit base and loan business.

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

Ratings

ECB's overall rating is a blend of the state ratings, and where applicable, multistate ratings.

The bank's overall rating is based on performance within the bank's AAs. The OCC weighed information from the following performance criteria when analyzing the bank's primary lending product: loan-to-deposit ratio, lending within the AA, lending to borrowers of different incomes and the geographic distribution of loans. The most weight was given to the Eaton County AAs because this is the bank's primary market for deposits and lending.

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

Discriminatory or Other Illegal Credit Practices Review

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

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) 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 Michigan¹: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The bank distribution of home mortgage loans among individuals of different income levels is reasonable.
- The bank's geographic distribution of home mortgage loans is reasonable.
- A majority of the bank's loans are inside its assessment area (AA).
- The bank's loan-to-deposit (LTD) ratio is reasonable.

Description of Institution's Operations in Michigan

ECB's operations in Michigan consists of three AAs, which include the Eaton, Barry, and Livingston Counties. The bank has six full-services branches, four offices (including the main office) are in Eaton County, and one branch each in Ingham and Barry Counties. The Eaton County AA has one branch (main office) located in a moderate-income CT and the other three branches are located in middle-income CTs. The branches in Ingham and Barry Counties are located in middle-income CTs. The only branch in Livingston County, the Gregory branch, was closed, effective July 30, 2021. All branches have an onsite deposit-taking ATM and offer drive-through services. The branch hours are the same for lobby and drive-thru, with the exception of the main office which has lobby hours on Saturday. No branches were opened since the last CRA evaluation.

Eaton County AA, based on 2015 ACS data, is comprised of no low-income CTs, three moderate-income CTs, 26 middle-income CTs, nine upper-income CTs, and one CT that has not been assigned an income classification. In Barry County AA, there are no low- or moderate-income CTs, two middle-income CTs. There are also no low- or moderate-income CTs in Livingston County and only two middle-income CTs.

Banking competition within the AA is high. According to the June 30, 2021, FDIC Deposit Market Share Report, there are 25 financial institutions with 142 offices serving the Eaton, Barry, Clinton, Ingham and Livingston Counties. ECB is ranked 12th in terms of deposit market share in the AAs, with 2.5 percent of total deposits. The top five institutions have a market share of 57.6 percent. These institutions include PNC Bank, National Association, JPMorgan Chase, First National Bank of America, Fifth Third, National Association, and The Huntington National Bank. The top ten banks have a combined market share of 83.5 percent.

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

The largest cities in the Eaton AA are Waverly, Charlotte and Eaton Rapids. The economy is driven largely by manufacturing, health care and social assistance and retail trade. Major employers include Spartan Motors, Inc, Eaton Rapids Medical Center, and Hayes Green Beach Memorial Hospital. The unemployment rate in Eaton County was 3.5 percent as of December 31, 2021. This was lower than the state unemployment rate of 4.2 percent.

As part of the evaluation process, examiners conducted one community contact covering the Eaton County AA. The community organization covers Eaton, Ingham, Clinton, and Shiawassee Counties. The community organization focuses on providing affordable housing and social services to low- and moderate-income individuals and families. The organization noted basic needs in the AA include affordable housing, utility assistance, employment, job training, childcare, financial education, homeless housing and shelter, food and child abuse/neglect care. The organization needs include general operating support, financial assistance for financial education coaches, individuals for Volunteers Income Tax Assistance (VITA), funds for transitional housing assistance, homeless prevention and emergency service, and lines of credit.

Eaton County

Table A – Demographic Information of the Assessment Area						
Assessment Area: Eaton County AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	39	0.0	7.7	66.7	23.1	2.6
Population by Geography	151,560	0.0	7.4	66.6	26.0	0.0
Housing Units by Geography	63,995	0.0	7.7	67.7	24.6	0.0
Owner-Occupied Units by Geography	43,985	0.0	5.7	65.9	28.3	0.0
Occupied Rental Units by Geography	15,305	0.0	12.5	70.8	16.7	0.0
Vacant Units by Geography	4,705	0.0	11.0	73.9	15.1	0.0
Businesses by Geography	9,205	0.0	8.5	66.6	24.9	0.0
Farms by Geography	635	0.0	3.9	72.3	23.8	0.0
Family Distribution by Income Level	40,235	17.3	18.9	22.9	40.9	0.0
Household Distribution by Income Level	59,290	17.7	15.7	19.5	47.0	0.0
Median Family Income MSA - 29620 Lansing-East Lansing, MI MSA		\$63,978	Median Housing Value			\$134,819
			Median Gross Rent			\$778
			Families Below Poverty Level			7.3%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Michigan

This analysis reflects a full-scope review of the ECB’s Eaton MSA AA. To develop conclusions, the OCC considered the number of home mortgage loans originated or purchased by the bank from January 1, 2019 through December 31, 2021. Examiners gave more weight to the distribution of loans to

individuals of different income levels and the geographic distribution of home mortgage loans. Examiners also considered any factors affecting the bank's ability to lend in its AA during the evaluation period, such as demographic and market share information. Refer to the Rating section above.

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Eaton County AA is good.

Distribution of Loans by Income Level of the Geography

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

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 bank's distribution of home mortgage loans among geographies of different income levels in the Eaton AA, during the evaluation period is reasonable. There were no low-income CTs with this AA during the evaluation period. The bank's percentage of home mortgage loans among moderate-income CTs in the AA was 9.1 percent. This exceeded the 5.7 percent of the AAs owner-occupied housing units in moderate-income geographies and is above the 5.5 percent of aggregate bank lending.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels 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.

ECB's distribution of home mortgage loans to borrowers of different income levels during the evaluation period in the Eaton AA is reasonable. The bank's percentage of home mortgage loans to low-income borrowers was 6.6 percent. This is significantly below the 17.3 percent of low-income families living in the AA, but near the 7.7 percent aggregate bank lending level. The bank's percentage of home mortgage loans to moderate-income borrowers is 21.3 percent. It is above the 18.9 percent of moderate-income families living in the AA, but near the 23.2 percent aggregate bank lending level.

Responses to Complaints

ECB did not receive any complaints during the evaluation period that would affect its CRA rating.

Conclusions for Areas Receiving Limited Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Barry County and Livingston County AAs is weaker than the bank's overall performance under the Lending Test in the full-scope area due to low level of loans that the bank originated in the Barry County and Livingston County AAs during the evaluation period. The bank only originated nine home mortgage loans in the Barry County AA during the evaluation period, with no loans to low-income borrowers and one to moderate-income borrowers. In the Livingston County AA, the bank only originated five home mortgage loans during the evaluation period, with no loans to low-income borrowers and one to a moderate-income borrower. Due to the relative size of the AA, the lack of any low- or moderate-income CTs, and the associated activity levels, the bank's performance in the limited-scope area did not materially impact its overall Lending Test rating. Refer to tables O and P in Appendix D for the facts and data that support these conclusions.

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 MSAs and non-MSAs 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:	1/1/2019 to 12/31/2021	
Bank Products Reviewed:	Home mortgage	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Not Applicable	Not Applicable	No affiliate products reviewed
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Eaton MSA	Full-Scope	Entire Eaton County, Clinton County 103.00, 104.00, Ingham County 64.01, 64.02, 60.01, 60.02, 61, 62, 63.01, 63.02, 9803
Barry MSA	Limited-Scope	101.00, 108.00
Livingston MSA	Limited-Scope	7311, 7321
States		
Michigan		

Appendix B: Summary of MMSA and State Ratings

RATINGS Eaton Community Bank	
Overall Bank:	Lending Test Rating
Eaton Community Bank	Satisfactory
State:	
Michigan	Satisfactory

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 Data²

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.

² The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2019-21
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	
Eaton County AA	427	66,783	96.8	7,817	0.0	0.0	0.0	5.7	9.1	5.5	65.9	69.8	63.4	28.3	21.1	31.1	0.0	0.0	0.0	
Livingston County AA	5	1,162	1.5	524	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0	
NonMSA Barry County AA	9	1,555	2.0	414	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0	
Total	441	69,500	100.0	8,755	0.0	0.0	0.0	5.2	8.8	4.9	69.4	70.7	67.3	25.5	20.4	27.8	0.0	0.0	0.0	

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 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																				2019-21
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	
Eaton County AA	427	66,783	96.8	7,817	17.3	6.6	7.7	18.9	21.3	23.2	22.9	26.5	25.9	40.9	38.9	30.5	0.0	6.8	12.8	
Livingston County AA	5	1,162	1.1	524	9.1	0.0	14.1	18.8	20.0	29.2	28.7	40.0	25.6	43.3	40.0	19.3	0.0	0.0	11.8	
NonMSA Barry County AA	9	1,555	2.0	414	21.6	0.0	5.1	24.1	11.1	24.6	21.4	22.2	24.4	32.9	66.7	30.7	0.0	0.0	15.2	
Total	441	69,500	100.0	8,755	17.2	6.3	8.0	19.2	21.1	23.6	23.0	26.5	25.8	40.6	39.5	29.8	0.0	6.6	12.8	

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%