



**PUBLIC DISCLOSURE**

September 29, 2025

**COMMUNITY REINVESTMENT ACT  
PERFORMANCE EVALUATION**

The First National Bank & Trust  
Charter Number: 3806

233 South Stephenson Avenue  
Iron Mountain, MI 49801

Office of the Comptroller of the Currency

1200 North Mayfair Road, 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 bank exhibits a reasonable distribution of loans by income level of the geography.
- The bank exhibits a reasonable distribution of loans to businesses of different sizes.
- The bank's performance under the Community Development (CD) Test is rated Satisfactory.
- The bank exhibits adequate responsiveness to community development needs in the state through CD investments and services.
- The bank exhibits excellent responsiveness to CD needs in the state through CD loans.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the assessment area (AA), the bank's loan-to-deposit (LTD) ratio was reasonable.

The quarterly LTD ratio averaged 51.6 percent over the 12 quarters ended December 31, 2024. The bank ranks sixth in its peer group of seven similarly situated banks that have average LTD ratios ranging from 40.3 percent to 80.5 percent during the same time period. The peer group consists of banks ranging from \$141 million in assets to \$687 million in assets, with the bank being the second largest in its peer group.

### Lending in Assessment Area

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

The bank originated and purchased 87.33 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	67	89.33	8	10.67	75	14,555	84.93	2,582	15.07	17,137
Small Business	64	85.33	11	14.67	75	21,997	67.85	10,425	32.15	32,422
<b>Total</b>	131	87.33	19	12.67	150	36,552	73.75	13,007	26.25	49,558

Source: 1/1/2022 - 12/31/2024 Bank Data.  
Due to rounding, totals may not equal 100.0%

## Description of Institution

First National Bank & Trust (FNB) is a \$410 million bank headquartered in Iron Mountain, Michigan. The bank is wholly owned by FNB Bancshares, Inc. The bank operates five full-service branches, one trust office, and one mortgage loan production office. The main office and branches are located in middle-income census tracts (CTs). The bank also operates five automated teller machines (ATMs), including the one located at the main branch.

The bank offers a full suite of products including non-complex deposit products, one-to four-family mortgages, consumer loans, commercial loans, brokerage services, insurance, and trust services. As of December 31, 2024, the loan portfolio totals \$193.4 million and represents 47.2 percent of total assets. The loan portfolio consists of 64.4 percent commercial loans, 30.5 percent residential loans, and 4.8 percent consumer loans. Tier 1 capital totals \$35.6 million.

FNB has one AA which includes 30 CTs, located in both Michigan and Wisconsin. The AA includes all of Dickinson, Iron, and Menominee Counties in the state of Michigan, and Florence County and Menominee County in Wisconsin. The AA does not lie in a metropolitan statistical area (MSA). Based on the FFIEC's December 2024 List of Distressed or Underserved Nonmetropolitan Middle-Income Geographies, both CTs in Iron County, Florence County, and Menominee County are listed as distressed middle-income CTs due to population loss or unemployment. Michigan and Wisconsin are combined into one AA due to the fact that both areas rely on the same local economy and have similar demographics. The bank's AA complies with regulatory requirements and does not arbitrarily exclude any low- or moderate-income (LMI) geographies.

There are no financial or legal impediments that limit the bank's ability to meet the credit needs of the AA. FNB's last CRA evaluation was dated June 22, 2022. Using Small-Intermediate Bank procedures, the bank received a Satisfactory rating.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

We evaluated FNB'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 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 evaluation from January 1, 2022, through December 31, 2024. The lending Test evaluated loans originated between January 1, 2022, and

December 31, 2024. The CD Test covered CD loans, investments, and services between the same period.

To evaluate 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 include only those loans, investments, and services that met the regulatory definition of CD in our CD Test analysis.

### **Selection of Areas for Full-Scope Review**

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

### **Ratings**

The bank's overall rating is based on the full-scope review of the non-MSA AA.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c) (March 29, 2024) in determining a national banks 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 Consumer Financial Protection Bureau, 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<sup>1</sup>:** Satisfactory

**The Lending Test is rated:** Satisfactory

**The Community Development Test is rated:** Satisfactory

The major factors that support this rating include:

- The bank exhibits a reasonable distribution of loans by income level of the geography.
- The bank exhibits a reasonable distribution of loans to businesses of different sizes.
- The bank's performance under the Community Development Test is rated Satisfactory.
- The bank exhibits adequate responsiveness to community development needs in the state through CD investments and services.
- The bank exhibits excellent responsiveness to community development needs in the state through CD loans.

### Description of Institution's Operations in Michigan

According to the 2024 Dun & Bradstreet SBSF Demographics, the bank's AA is comprised of 30 CTs, of which zero are low income, four (13.3 percent) are moderate-income, 23 (76.7 percent) are middle-income, and two (6.7 percent) are upper-income. The total population of the AA is 89,288, which is comprised of 24,052 families. The number of families at each income level is 4,353 (18.1 percent) low-income families, 4,979 (20.7 percent) moderate income families, 5,484 (22.8 percent) middle-income families, and 9,236 (38.4 percent) upper-income families. The median family income for the Wisconsin non-MSA AA is \$86,700, and the median family income for the Michigan non-MSA is \$78,300. Owner-occupied housing units equate to 51.9 percent of total housing units. The number of businesses with reported revenues in this AA was 2,972, of which 2,131 (71.7 percent) had revenues under \$1 million, 376 (12.7 percent) had revenues over \$1 million, and 464 (15.6 percent) did not have available revenue data for 2024.

According to the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report as of September 30, 2025, FNB ranks second among 16 deposit taking institutions within the non-MSA AA with 14.5 percent of deposits. FNB's largest competitor is the Stephenson National Bank and Trust with 20.8 percent of total deposits. Nicolet National Bank and Associated Bank, National Association hold 9.2 percent and 7.9 percent of total deposits within the non-MSA AA, respectively, with the remaining financial institutions holding 7.0 percent or less of total deposits.

#### Economic and Other Factors

According to the U.S. Department of Labor, Bureau of Labor Statistics Report, unemployment rates in the five counties ranged from 4.3 percent to 8.1 percent and averaged 5.5 percent in January 2022.

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

Unemployment rates in the five counties ranged from 4.0 percent to 8.7 percent and averaged 5.4 percent in December 2024. Unemployment rates in the state of Michigan ranged from 5.0 percent to 3.6 percent and ranged from 3.5 percent to 2.2 percent in the state of Wisconsin for the same period.

Community Contact

We spoke with one community contact from a local economic development alliance. The needs of the community are being met by local financial institutions. The contact indicated that the local economy is doing well and that there are job opportunities in a variety of roles. Vacancies in commercial properties are low. Low housing inventory and high housing prices are the largest challenge for middle- and moderate-income residents. However, area economic development alliances have actively pushed for multifamily developments to address the issue. The contact indicated that there is a 68-unit middle market apartment complex beginning construction next year that should alleviate some middle market needs.

**Ratings**

The bank’s overall rating is based on the full-scope review of the non-MSA AA.

**Non-MSA AA**

Assessment Area(s) - FNB Non-MSA 2024						
						2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	30	0.0	13.3	76.7	6.7	3.3
Population by Geography	89,288	0.0	11.6	79.5	8.9	0.00
Housing Units by Geography	60,699	0.0	17.3	75.6	7.2	0.00
Owner-Occupied Housing by Geography	31,481	0.0	12.0	77.9	10.1	0.00
Occupied Rental Units by Geography	8,500	0.0	11.48	8.50	3.5	0.00
Vacant Units by Geography	20,718	0.0	27.6	68.1	4.2	0.00
Businesses by Geography	2,972	0.0	13.3	78.5	8.3	0.00
Farms by Geography	157	0.0	15.3	75.2	9.6	0.00
Family Distribution by Income Level	24,052	18.1	20.7	22.8	38.4	0.00
Household Distribution by Income Level	39,981	24.9	17.5	20.3	37.4	0.00
Unemployment rate (%)	4.9	0.00	5.8	5.0	2.6	0.00
Households Below Poverty Level (%)	12.3	0.00	9.5	13.1	8.6	0.00
Median Family Income (Non-MSAs - MI)		\$63,042		Median Housing Value		\$105,450
Median Family Income (Non-MSAs - WI)		\$71,403		Median Gross Rent		\$633
Median Family Income (Non-MSAs - MI) for 2024		\$78,300		Families Below Poverty Level		7.2
Median Family Income (Non-MSAs - WI) for 2024		\$86,700				
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

## **Scope of Evaluation in Michigan**

The non-MSA AA is the bank's only AA and it 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.

### **Conclusions for Area Receiving a Full-Scope Review**

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 exhibited reasonable geographic distribution of loans in the state.

#### ***Home Mortgage Loans***

Refer to table 7 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 distribution of home mortgage loans is reasonable.

#### **2022-23:**

The distribution of home mortgage loans is excellent.

The proportion of lending in moderate-income geographies exceeded both the percentage of owner-occupied housing units and the aggregate distribution of all reporting lenders.

#### **2024:**

The distribution of home mortgage loans is reasonable.

The proportion of lending in moderate-income geographies exceeded the percentage of owner-occupied housing units and was less than the aggregate distribution of all reporting lenders.

#### ***Small Loans to Businesses***

Refer to table 9 in the 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 distribution of small loans to businesses is reasonable.

#### **2022-23:**

The distribution of small loans to businesses is poor.

The proportion of lending to businesses in moderate-income geographies was less than both the percentage of businesses in moderate-income geographies and the aggregate distribution of all reporting lenders.

2024:

The distribution of small loans to businesses is excellent.

The proportion of lending to businesses in moderate-income geographies exceeded the percentage of businesses in moderate-income geographies.

***Lending Gap Analysis***

We performed a lending gap analysis that included a review of sampled small loans to businesses. We did not identify any unexplained, conspicuous gaps in lending.

**Distribution of Loans by Income Level of the Borrower**

The bank exhibited 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 8 in the 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 distribution of home mortgage loans is reasonable.

2022-23:

The distribution of home mortgage loans is reasonable.

The proportion of lending to low-income borrowers was less than both the percentage of low-income families and the aggregate distribution of all reporting lenders. The proportion of lending to moderate-income borrowers exceeded both the percentage of moderate-income borrowers and the aggregate distribution of all reporting lenders.

2024:

The distribution of home mortgage loans is reasonable.

The proportion of lending to low-income borrower was less than the both the percentage of low-income families and the aggregate distribution of all reporting lenders. The proportion of lending to moderate-income borrowers exceeded the percentage of moderate-income families and was near to the aggregate distribution of all reporting lenders

***Small Loans to Businesses***

Refer to table 10 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 distribution of small business loans is reasonable.

2022-23:

The distribution of small business loans is excellent.

The proportion of lending to small businesses exceeded both the percentage of small businesses and the aggregate distribution of all reporting lenders.

2024:

The distribution of small business loans is reasonable.

The proportion of lending to small businesses was near to the percentage of small businesses.

**Responses to Complaints**

There were no consumer complaints regarding the bank’s CRA performance, nor any illegal or discriminatory lending practices noted during this evaluation.

**COMMUNITY DEVELOPMENT TEST**

The bank’s performance under the CD Test in the is rated Satisfactory.

Based on a full scope the review, the bank exhibited adequate responsiveness to community development needs in the AA 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 CD 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 for CD loans.

<b>Table 3: Community Development Loans</b>				
<b>Assessment Area</b>	<b>Total</b>			
	<b>#</b>	<b>% of Total #</b>	<b>\$(000's)</b>	<b>% of Total \$</b>
Non-MSA	10	100%	1,397	100%

FNB’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 10 loans for a total of \$1.4 million within the bank’s AA. The majority of the bank’s CD loans were made to support housing needs, community services, and economic development and revitalization. A few notable examples include:

- Three loans totaling \$178 thousand to a local non-profit organization with the purpose of providing affordable housing for purchase by LMI individuals or families.
- Two loans totaling \$338 thousand for day care that is enrolled in a CACFP and has 16/20 enrolled students who qualify for state aid.

- One loan that totals \$250 thousand to a local non-profit organization which works to improve employment opportunities for LMI individuals with disabilities.
- One loan that totals \$277 thousand for an adult foster home that care to LMI individuals.

### Number and Amount of Qualified Investments

Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Non-MSA	1	225	3	2,147	4	100%	2,372	100%	0	0

The number of qualified community development investments is adequate, totaling \$2.37 million for the review period.

Additionally, the bank made 17 donations for a total of \$122 thousand 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 and housing assistance for LMI individuals, and healthcare needs for LMI individuals and communities. While not a comprehensive list, below are a few notable donations.

- One donation totaling \$33 thousand was provided to a local area chamber of commerce for business development and economic growth within Dickinson County.
- One donation totaling \$33 thousand was provided to an area economic development alliance to support housing, revitalization, and economic development initiatives.
- One donation totaling \$10 thousand was provided to a non-profit organization who hosts trainings, meeting, children activities, youth leadership team projects and education including LMI families.

### Extent to Which the Bank Provides Community Development Services

FNB provides a reasonable level of CD services through its branches, products, and activities with local organizations that support many activities that directly benefit LMI populations and distressed areas in the bank's AA. The bank does not operate branches or ATMs located in moderate-income CTs or distressed areas, but branch and ATM locations are within a reasonable distance of both. The bank provides affordable banking services in its AA.

During the evaluation period, 20 FNB employees provided technical assistance and financial expertise to 31 CD organizations serving the bank's AA. These organizations address AA needs for 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:

- Two bank employees serve as board members for an area economic development infrastructure committee, providing lending expertise to help promote talent attraction, business retention and economic growth in Dickinson County to all individuals regardless of income.
- One bank member serves on a scholarship committee that provides college scholarships to local high school seniors based on financial need.
- Ten bank employees commit to teaching financial literacy at high school mock interviews and breakout sessions including LMI individuals.

## Appendix A: Scope of Examination

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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”.

<b>Time Period Reviewed:</b>	January 1, 2022, through December 31, 2024	
<b>Bank Products Reviewed:</b>	Home mortgage, small business, community development loans, qualified investments, community development services.	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None.		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
Non-MSA	Full-Scope	Dickinson – 7 (MI), Iron – 5 (MI), Menominee – 7 (MI), Florence – 3 (WI), Marinette – 7 (WI)

## Appendix B: Summary of MMSA and State Ratings

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RATINGS		The First National Bank & Trust	
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Satisfactory	Satisfactory	Satisfactory	Satisfactory

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

## Appendix C: Definitions and Common Abbreviations

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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 the 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 low- and moderate-income 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):** 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 CD loans and qualified investments, branch distribution, and CD services).

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

**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.

**Multistate Metropolitan Statistical Area (MMSA):** Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

**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.

**Prior Period Investments:** Investments made in a previous evaluation period that are outstanding as of the end of the evaluation period.

**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 multistate 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 multistate metropolitan statistical area, the institution will receive a rating for the multistate 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.

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

**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

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/AA. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> 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 7. 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 8. 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/AA. The table also presents aggregate peer data for the years the data is available.
- Table 9. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** – Compares 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 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 AA.
- Table 10. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: (1) the percentage distribution of businesses with revenues of greater than \$1 million; and, (2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

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

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2023		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total Number	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		
Non-MSA	44	9,367	100.00	3,441	--	--	--	19.49	20.45	19.38	74.65	61.36	78.15	5.86	18.18	2.47	--	--	--		
<b>Total</b>	<b>44</b>	<b>9,367</b>	<b>100.00</b>	<b>3,441</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>19.49</b>	<b>20.45</b>	<b>19.38</b>	<b>74.65</b>	<b>61.36</b>	<b>78.15</b>	<b>5.86</b>	<b>18.18</b>	<b>2.47</b>	<b>--</b>	<b>--</b>	<b>--</b>		

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2024		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total Number	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		
Non-MSA	23	5,188,050	100.00	1,705	--	--	--	11.97	13.04	16.36	77.89	69.57	77.89	10.14	17.39	5.75	--	--	--		
<b>Total</b>	<b>23</b>	<b>5,188,050</b>	<b>100.00</b>	<b>1,705</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>11.97</b>	<b>13.04</b>	<b>16.36</b>	<b>77.89</b>	<b>69.57</b>	<b>77.89</b>	<b>10.14</b>	<b>17.39</b>	<b>5.75</b>	<b>--</b>	<b>--</b>	<b>--</b>		

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Sample Bank Loans, 2024 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Non-MSA	44	9,366,665	100.00	3,441	18.88	9.09	12.76	21.11	29.55	23.45	22.81	13.64	20.87	37.19	47.73	28.63	--	--	14.30
<b>Total</b>	<b>44</b>	<b>9,366,665</b>	<b>100.00</b>	<b>3,441</b>	<b>18.88</b>	<b>9.09</b>	<b>12.76</b>	<b>21.11</b>	<b>29.55</b>	<b>23.45</b>	<b>22.81</b>	<b>13.64</b>	<b>20.87</b>	<b>37.19</b>	<b>47.73</b>	<b>28.63</b>	<b>--</b>	<b>--</b>	<b>14.30</b>

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Sample of Bank Loans, 2022, 2023 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Non-MSA	23	5,188,050	100.00	1,705	18.11	8.70	11.14	20.72	21.74	25.81	22.75	26.09	20.35	38.42	43.48	27.45	--	--	15.25
<b>Total</b>	<b>23</b>	<b>5,188,050</b>	<b>100.00</b>	<b>1,705</b>	<b>18.11</b>	<b>8.70</b>	<b>11.14</b>	<b>20.72</b>	<b>21.74</b>	<b>25.81</b>	<b>22.75</b>	<b>26.09</b>	<b>20.35</b>	<b>38.42</b>	<b>43.48</b>	<b>27.45</b>	<b>--</b>	<b>--</b>	<b>15.25</b>

Source: FFIEC File - 2020 Census; 1/1/2024 - 12/31/2024 Sample of Bank Loans, 2022, 2023 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Non-MSA	40	16,262,840	100.00	1,996	--	--	--	21.50	15.00	23.65	74.94	80.00	71.71	3.56	5.00	4.61	--	--	--
<b>Total</b>	<b>40</b>	<b>16,262,840</b>	<b>100.00</b>	<b>1,996</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>21.50</b>	<b>15.00</b>	<b>23.65</b>	<b>74.94</b>	<b>80.00</b>	<b>71.71</b>	<b>3.56</b>	<b>5.00</b>	<b>4.61</b>	<b>--</b>	<b>--</b>	<b>--</b>

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Sample Bank Loans, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

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

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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Non-MSA	22	5,409,168	100.00	--	--	--	--	13.26	27.27	--	78.47	59.09	--	8.28	13.64	--	--	--	--
<b>Total</b>	<b>22</b>	<b>5,409,168</b>	<b>100.00</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>13.26</b>	<b>27.27</b>	<b>--</b>	<b>78.47</b>	<b>59.09</b>	<b>--</b>	<b>8.28</b>	<b>13.64</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Sample Bank Loans, 2024 Dunn & Bradstreet SBSF Demographics, -- 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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Non-MSA	40	16,262,840	100.00	1,996	69.05	70.00	56.96	14.28	30.00	16.67	--
<b>Total</b>	<b>40</b>	<b>16,262,840</b>	<b>100.00</b>	<b>1,996</b>	<b>69.05</b>	<b>70.00</b>	<b>56.96</b>	<b>14.28</b>	<b>30.00</b>	<b>16.67</b>	<b>--</b>

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Sample Bank Loans, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Non-MSA	22	5,409,168	100.00	--	71.74	63.64	--	12.65	36.36	15.61	--
<b>Total</b>	<b>22</b>	<b>5,409,168</b>	<b>100.00</b>	<b>--</b>	<b>71.74</b>	<b>63.64</b>	<b>--</b>	<b>12.65</b>	<b>36.36</b>	<b>15.61</b>	<b>--</b>

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Sample Bank Loans, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.  
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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.