



PUBLIC DISCLOSURE

October 11, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First National Bank of St. Ignace
3886

132 N. State Street
St. Ignace, MI 49781

Office of the Comptroller of the Currency
North Ohio Office
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.

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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 small loans to businesses among borrowers of different sizes, and a reasonable geographic distribution of home mortgages and small loans to businesses.
- A substantial majority of the bank's loans are inside its assessment area (AA).
- The bank's loan-to-deposit (LTD) ratio is reasonable.

Loan-to-Deposit Ratio

The bank's LTD ratio is lower than its peer banks; however, given the bank's sale of loans on the secondary market, the ratio is deemed reasonable for the bank's size, financial condition, and credit needs of its AA.

We evaluated First National Bank of St. Ignace (FNB St. Ignace or bank) quarterly LTD ratios for the period of September 30, 2019, to June 30, 2022. The bank's average LTD ratio during this period was 27.9 percent, with quarterly ratios ranging from 22.2 percent in the third quarter of 2021, to 35.1 percent in the first quarter of 2020. We compared FNB St. Ignace's LTD ratio to four similarly situated banks located in Cheboygan, Harbor Springs, and Sault Sainte Marie Counties, with assets between \$131.0 million and \$488.4 million. The average LTD ratio for similarly situated banks ranged from 46.1 percent to 82.7 percent.

The bank originates residential real estate loans that are immediately sold on the secondary market. As of December 31, 2021, the bank had \$22.5 million in loans serviced for others. This represents another 6.67 percent of total deposits that is not captured in the LTD ratio noted above.

Lending in Assessment Area

A substantial majority of the bank's loans are inside its AA. The bank originated and purchased 85.8 percent by number and 76.4 percent by dollar amount of its total loans inside the bank's AA during the evaluation period. This analysis is performed at the bank level rather than the AA level and resulted in a positive impact on the bank's overall geographic distribution of lending by income.

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	23	92.0	2	8.0	25	1,819	90.4	194	9.6	2,013
2020	29	87.9	4	12.1	33	3,967	81.5	903	18.5	4,870
2021	32	94.1	2	5.9	34	6,692	78.5	1,014	21.5	4,706
Subtotal	84	91.3	8	8.7	92	9,478	81.8	2,111	18.2	11,589
Small Business										
2019	17	77.3	5	22.7	22	2,496	63.2	1,451	36.8	3,947
2020	17	73.9	6	26.1	23	2,661	59.2	1,836	40.8	4,497
2021	27	84.4	5	15.6	32	4,266	90.8	434	9.2	4,701
Subtotal	61	79.2	16	20.8	77	9,423	71.7	3,721	28.3	13,145
Total	145	85.8	24	14.2	169	18,901	76.4	5,832	23.6	24,734

Source: Bank Data January 1, 2019 to December 31, 2021
Due to rounding, totals may not equal 100.0%

Description of Institution

FNB St. Ignace is a full-service, intrastate community bank headquartered in St. Ignace, Michigan, and is a wholly owned subsidiary of Mackinac National Bancorp, Inc., a one-bank holding company. The bank's operations are focused within the counties of Mackinac, Luce, Chippewa, Emmet, and Cheboygan. As of December 31, 2021, the bank's assets totaled \$366.1 million, and tier one capital totaled \$20.4 million, or 5.6 percent of total assets.

The bank has seven full-services branches. Six offices (including the main office) are in Mackinac County in middle-income census tracts (CT). The other branch is in Luce County, which is a moderate-income CT. All branches have an onsite deposit-taking ATMs and offer drive-through services. Additionally, the bank has five off-site ATM locations: three in grocery stores in St. Ignace, Cedarville, and Newberry, and at a hotel and taxi stand on Mackinac Island. No branches were opened or closed since the last CRA examination.

The bank's primary loan products are residential real estate loans and loans to small businesses. During the evaluation period, the bank's loan portfolio decreased by 0.9 percent to \$82.5 million. As of December 31, 2021, the loan portfolio was comprised of commercial real estate loans (\$39.2 million or 47.6 percent), residential real estate loans (\$21.2 million or 25.7 percent), commercial and industrial loans (\$7.2 million or 8.7 percent), construction loans (\$7.0 million or 8.5 percent), consumer loans (\$5.2 million or 6.3 percent), and farm loans (\$.2 million or .2 percent).

FNB St. Ignace offers traditional home loan products, including home mortgage loans, home improvement loans, adjustable-rate mortgages (ARMs), and home construction loans. The bank also offers consumer

loans and commercial loans. The bank’s consumer deposit-related products and services include checking, savings, and money market accounts, certificates of deposit, individual retirement accounts, online bill pay, mobile banking, overdraft protection, safe deposit boxes, and ATM services. Business-related deposit products and services include checking accounts, online banking, and ACH services.

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 September 9, 2019.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assesses FNB St. Ignace’s record of meeting the credit needs of its AA. We performed a full-scope review using Small Bank CRA procedures, which includes the lending test. We performed the lending test analysis using a sample of home mortgage loans and small loans to businesses. The evaluation period for the lending test covers January 1, 2019, to December 31, 2021. The bank is not a Home Mortgage Disclosure Act (HMDA) reporter.

Based on the bank’s internal reports and discussions with management, we determined that the bank’s primary lending products during the evaluation period were home mortgages and small loans to businesses. We used other supporting information to complete our review, including the 2015 American Community Survey (ACS) data, internal bank records, deposit market share data, community contact information, and information from governmental websites regarding the characteristics and economy of the bank’s AA.

Selection of Areas for Full-Scope Review

FNB St. Ignace has one AA, the St. Ignace non-MSA AA, which contains all the bank’s branches and provides its entire deposit base and loan business. We performed a full-scope review of the AA. Please refer to *Appendix A: Scope of Examination*, for more information.

Ratings

The bank’s overall rating is based on its state of Michigan lending performance within the FNB St. Ignace non-MSA AA.

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 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 Michigan¹: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The bank's distribution of home mortgage loans among individuals of different income levels and small loans to businesses of different sizes is reasonable.
- The bank's geographic distribution of home mortgage loans and small loans to businesses is reasonable.

Description of Institution's Operations in Michigan

As of December 31, 2021, FNB St. Ignace had one AA within the state of Michigan, the St. Ignace non-MSA AA. The AA includes the entire counties of Mackinac and Luce, and partial counties of Chippewa, Emmet, and Cheboygan and does not arbitrarily exclude any low- or moderate-income geographies. During the evaluation period, the bank operated seven full-service branches within the AA. Six offices (including the main office) are in Mackinac County in middle-income CTs. The other branch is in Luce County and in a moderate-income CT. All branches have an onsite deposit-taking ATM and offer drive-through services. Additionally, the bank has five off-site ATM locations: three in grocery stores in St. Ignace, Cedarville, and Newberry, and at a hotel and taxi stand on Mackinac Island.

The AA consists of 18 CTs and based on the FFIEC's 2021 List of Distressed or Underserved Nonmetropolitan Middle-Income Geographies, there are ten distressed and underserved middle-income CTs in the bank's AA. The reasons included poverty, unemployment, remote rural locations, and bank deserted. The AA complies with regulatory requirements. Based on 2020 U.S. Census data, there are no low-income or upper-income CTs in the St. Ignace non-MSA AA. Of the 18 CTs in the AA, three are moderate-income, 11 are middle-income, and four geographies that have not been assigned an income classification.

Banking competition within the AA is high. According to the June 30, 2021, FDIC Deposit Market Share Report, there are twelve financial institutions with 48 offices serving St. Ignace non-MSA AA. The bank is ranked 4th in terms of deposit market share in the AA, with 11.9 percent of total deposits. The top five institutions (including FNB St. Ignace) in the June 2021 report have a market share of 51.0 percent and include Citizens National Bank of Cheboygan, Central Savings Bank, JP Morgan Chase, and Huntington National Bank.

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 two largest cities in the AA are St. Ignace and Sault Ste Marie. Prominent industries include health care and social assistance, educational services, and retail trade, public administration, accommodations, and food services. Major employers include Grand Hotel and Sault Ste. Marie Public Schools. As of December 31, 2021, the unemployment rate in the AA was 6.2 percent, which exceeded the state unemployment rate of 4.2 percent. Unemployment rates within the AA are seasonal, with higher unemployment during the fall and winter and lower unemployment during the spring and summer tourist season.

As part of this performance evaluation, we considered information obtained from one community contact within the AA to gain an understanding of the community development needs and credit opportunities of the AA. The community organization focuses on providing affordable housing. The organization noted adequate and affordable housing as one of the greatest needs in the AA. The organization noted the bank has been a valuable partner and provided volunteers for homeownership workshops.

FNB St Ignace Non-MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: FNB St Ignace Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	18	0.0	16.7	61.1	0.0	22.2
Population by Geography	39,449	0.0	27.5	67.9	0.0	4.6
Housing Units by Geography	29,845	0.0	18.1	81.9	0.0	0.0
Owner-Occupied Units by Geography	11,649	0.0	19.5	80.5	0.0	0.0
Occupied Rental Units by Geography	3,484	0.0	33.4	66.6	0.0	0.0
Vacant Units by Geography	14,712	0.0	13.4	86.6	0.0	0.0
Businesses by Geography	2,398	0.0	19.9	79.8	0.0	0.3
Farms by Geography	144	0.0	17.4	82.6	0.0	0.0
Family Distribution by Income Level	9,933	21.3	21.4	22.6	34.7	0.0
Household Distribution by Income Level	15,133	23.6	18.9	19.4	38.1	0.0
Median Family Income Non-MSAs - MI		\$53,628	Median Housing Value			\$117,224
			Median Gross Rent			\$602
			Families Below Poverty Level			12.0%
<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 St. Ignace non-MSA AA. To develop our conclusions, we considered the number of home mortgage loans and small loans to businesses originated or purchased by the bank during the evaluation period. We gave more weight to the distribution of loans to individuals of different income levels and businesses of different sizes, and the geographic distribution of home mortgage loans and small loans to business. We 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

Appendix A – Scope of Examination, for more information on this AA.

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 performance in the FNB St. Ignace non-MSA AA is good.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the state. In concluding on the bank's geographic distribution of home mortgage loans and small loans to businesses, we considered that there were no low-income CTs and only three moderate-income CTs in the AA.

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 bank's geographic distribution of home mortgage loan originations and purchases.

The bank's distribution of home mortgage loans among geographies of different income levels in the AA is reasonable. The bank's percentage of home mortgage loans among moderate-income CTs in the AA was 20.2 percent. This exceeded both the 19.5 percent of the AAs owner-occupied housing units in moderate-income geographies and the 15.6 percent of aggregate bank lending.

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.

FNB St. Ignace's distribution of small loans to businesses among geographies of different income levels in the non-MSA AA during the evaluation period is reasonable. The bank's percentage of small loans to businesses among moderate-income CTs was 13.1 percent. This is slightly below both the 19.9 percent of businesses in moderate-income CTs and the 18.1 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 and businesses and farms 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.

FNB St. Ignace's distribution of home mortgage loans to borrowers of different income levels during the evaluation period in the non-MSA AA is reasonable. The bank's percentage of home mortgage loans to low-income borrowers was 10.7 percent. This is well below the 21.3 percent of low-income families in the AA, but exceeds the 5.1 percent aggregate bank lending. The bank's percentage of home mortgage loans to moderate-income borrowers of 16.7 percent is slightly below the 21.4 percent of moderate-income families living in the AA, and exceeds the 14.1 percent aggregate bank lending level.

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.

FNB St. Ignace's distribution of small loans to businesses with revenues of less than \$1 million is reasonable. The bank's percentage of small loans to businesses with revenues of \$1 million or less was 82.0 percent, which is comparable to the 81.4 percent of small businesses in the AA and significantly exceeds the aggregate small loans to businesses lending level of 41.5 percent.

Responses to Complaints

There were no complaints during the evaluation period that would affect the bank's CRA rating.

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, Small Business	
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
FSN St. Ignace Non-MSA	Full-Scope	Mackinac County CTs – 9501, 9502, 9503, 9504, 9505; Luce County CTs – 9601, 9602, 9800; Chippewa County CTs – 9707, 9708, 9709, 9710, 9711, 9801, 9802, 9803; Emmet County CT - 9701; Cheboygan County CT - 9601
States		
Michigan		

Appendix B: Summary of MMSA and State Ratings

RATINGS The First National Bank of St. Ignace	
Overall Bank:	Lending Test Rating
First National Bank of St Ignace	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 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 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
FNB St Ignace Non-MSA AA	84	9,478	100.0	871	0.0	0.0	0.0	19.5	20.2	15.6	80.5	79.8	84.4	0.0	0.0	0.0	0.0	0.0	0.0
Total	84	9,478	100.0	871	0.0	0.0	0.0	19.5	20.2	15.6	80.5	79.8	84.4	0.0	0.0	0.0	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
FNB St Ignace Non-MSA AA	84	9,478	100.0	871	21.3	10.7	5.1	21.4	16.7	14.1	22.6	19.0	19.7	34.7	53.6	48.0	0.0	0.0	13.1
Total	84	9,478	100.0	871	21.3	10.7	5.1	21.4	16.7	14.1	22.6	19.0	19.7	34.7	53.6	48.0	0.0	0.0	13.1

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 Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2019-21

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
FNB St Ignace Non-MSA AA	61	9,423	100	448	0.0	0.0	0.0	19.9	13.1	18.1	79.8	86.9	81.9	0.0	0.0	0.0	0.3	0.0	0.0
Total	61	9,423	100	448	0.0	0.0	0.0	19.9	13.1	18.1	79.8	86.9	81.9	0.0	0.0	0.0	0.3	0.0	0.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2019-21

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
FNB St Ignace Non-MSA AA	61	9,423	100	448	81.4	82.0	41.5	4.2	18.0	14.3	0.0
Total	61	9,423	100	448	81.4	82.0	41.5	4.2	18.0	14.3	0.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%