



PUBLIC DISCLOSURE

August 18, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Capitol National Bank
Charter Number: 17525
200 Washington Square North
Lansing, MI 48933

Office of the Comptroller of the Currency

Cleveland-Pittsburgh-Detroit Field 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 bank’s lending activity as measured by its loan-to-deposit ratio (LTD) is reasonable.
- The bank originated the majority of its loans inside of its Assessment Area (AA).
- The bank’s record of originating small business loans among AA geographies of different income levels is excellent.
- The bank’s record of originating small business loans among AA businesses of different sizes is reasonable.

Loan-to-Deposit Ratio

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

The bank’s LTD ratio was calculated on a bank-wide basis. Over the 12-quarter evaluation period, spanning 2022, 2023, and 2024, the bank’s average quarterly LTD ratio was 74.5 percent. The bank’s quarterly LTD ratios ranged from a low of 56.2 percent for the first quarter of 2022 to a high of 96.7 percent for the fourth quarter of 2024. In comparison, over the 12-quarter period, LTD ratio averages for three similarly situated AA lenders were 98.0 percent, 61.1 percent, and 152.0 percent respectively.

The bank’s capacity to lend, as well as AA demographic and economic factors were considered when reaching the conclusion that the bank’s LTD ratio was reasonable.

Lending in Assessment Area

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

The analysis of the bank’s lending inside verses outside of its AA was performed at the bank level. During 2022 and 2023the bank originated 62.8 percent of total originations inside of its AA. Similarly, during 2024, of its total loan originations, the bank originated 65.6 percent inside of its AA. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Table 1: Lending Inside and Outside of the Assessment Area									2022-2024	
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business	128	63.7	73	36.3	201	31,217	54.0	26,599	46.0	57,816
Source: 1/1/2022 – 12/31/2024 Bank Data										
Due to rounding, totals may not equal 100.0%										

Description of Institution

Capitol National Bank (CNB) is an intrastate bank headquartered in Lansing, Michigan. The bank is shareholder owned and does not operate any subsidiaries. According to the Report of Condition and Income, as of December 31, 2024; the bank's assets totaled \$194.9 million. As of year-end 2022 and 2023, the bank's assets totaled \$182.9 million and \$184.1 million respectively. The bank offers traditional loan products, which include commercial, small business, second mortgage, home equity lines of credit (HELOC), and consumer loans. The bank's principal line of business is the origination of loans to small and mid-size businesses.

As of December 31, 2024, the bank's loan portfolio (net loans and leases) totaled \$156.6 million, representing 80.4 percent of total assets. Of the loan portfolio, 78.7 percent was secured by real estate. The loan portfolio was comprised of nonfarm nonresidential real estate loans (62.7 percent), loans to non-depository financial institutions (14.1 percent), commercial and industrial loans (8.7 percent), 1-4 family residential loans (7.8 percent), construction loans (6.3 percent), multi-family loans (2.9 percent), and consumer and auto loans (0.1 percent).

The bank's consumer deposit related products and services include checking, savings, money market accounts, certificates of deposit, individual retirement accounts, safe deposit, automated teller machine (ATM), digital wallet services, internet and mobile banking. Business related products and services include checking, savings, business money market accounts, cash management, remote deposit capture (RDC), and online, internet banking.

During the evaluation period, within its AA, the bank operated its main office and branch, a second branch office and two deposit-taking ATMs. The bank's main office and branch are situated in downtown Lansing Michigan. The bank's second branch office is located in Okemos Michigan. In December 2021, this second branch office was relocated to another address approximately .5 miles from the original address within the same Okemos, Michigan geography. The Okemos branch office offers drive-up night deposit and drive-thru services. Days and hours of operation are consistent between the two branch offices. The bank operated its two 24-hour deposit taking ATMs in conjunction with its two branch office locations.

The bank's two branch offices and ATMs are located with Ingham County, Michigan. Ingham County, in addition to contiguous Clinton County and Eaton County comprise the bank's single, delineated AA. These three contiguous Michigan Counties constitute the bank's AA as well as its rating area. The bank's AA comprises a portion of the Lansing-East Lansing Metropolitan Statistical Area (MSA).

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 19, 2021.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assessed the bank's record of meeting the credit needs of its AA. The evaluation was performed using Small Bank CRA examination procedures which consists of a lending test. The lending test evaluates the bank's record of meeting AA credit needs through its lending activities. Business loans were the bank's primary loan product and strategic focus. Therefore, the bank's business lending activities were assessed. Although the bank offers HELOCs, home improvement, and consumer instalment loans, these products are not primary loan products. Therefore, an analysis of this loan data would not have been meaningful and was not performed. The evaluation period for the bank's lending activity covers January 1, 2022, through December 31, 2024.

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 are combined and evaluated as a single AA. Refer to the "Scope" section under the State Rating for details regarding how the full-scope AA was selected. Refer to appendix A, Scope of Examination, for a list of full-scope AAs.

Ratings

The bank's overall rating is based on the bank's rating in the state of Michigan in which the bank has delineated its only 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: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The bank's record of originating loans to businesses across AA geographies of different income levels is excellent.
- The bank's record of originating loans to AA businesses of different sizes is reasonable.
- The bank did not receive any complaints regarding its performance in helping to meet AA credit needs.

Description of Institution's Operations in Michigan

Over the evaluation period, the bank operated two branch offices in Ingham County, Michigan, within its single AA. The bank operated one of its branch offices in the downtown area of Lansing Michigan and operated the other of its branches in Okemos Michigan. In December 2021, this second branch office was relocated to another address approximately .5 miles from the original address within the same Okemos, Michigan, geography. The Okemos branch office offers drive-up night deposit, and drive-thru service. Days and hours of operation are consistent between the two branch offices. The bank operated its two 24-hour deposit taking ATMs in conjunction with its two branch office locations.

The bank's Lansing AA meets the requirements of the CRA and does not arbitrarily exclude any low- or moderate-income geographies or census tracts (CTs). Specifically, the AA consists of 136 geographies, seven of which are classified as low-income, 28 are classified as moderate-income, 57 are classified as middle-income, 32 are classified as upper-income and 12 geographies have not been assigned an income classification.

The bank encountered significant competition for deposits within its AA. According to the Federal Deposit Insurance Corporation's (FDIC) Summary of Deposits Report as of July 22, 2025, within the bank's AA, 103 financial institutions accepted retail deposits and maintained 81 offices. This total does not include credit unions or other financial service providers. Among these institutions, CNB ranked 74th with 0.05 percent of total AA market share, or \$161.4 million of insured deposits. For CNB, all bank deposits were located within its AA. Primary deposit competitors included JPMorgan Chase Bank, N.A. (19.5 percent), Comerica Bank (12.5 percent), The Huntington N.A. (12.1 percent), Flagstar Bank, N.A. (10.7 percent), Bank of America (9.4 percent), PNC Bank, N.A. (6.9 percent), and Fifth Third Bank, N.A. (6.7 percent). These seven banks garnered a combined 77.7 percent of total AA deposit market share. Of the remaining AA competitors, there were no institutions that garnered more than 2.1 percent of the deposit market share.

The bank also encountered significant competition for business loans within its AA. Based on 2019 aggregate business loan data, within the AA, 63 lenders originated business loans. The top nine business lenders were large banks which accounted for 86.3 percent of AA business lending and included credit card issuers. Specifically, lenders with the largest small business loan AA market share included American Express National Bank (26.1 percent), JPMorgan Chase Bank N.A. (19.0 percent), Capital One, N.A. (9.0

percent), Citibank, N.A. (8.2 percent), Synchrony Bank (6.0 percent), U.S. Bank N.A. (5.8 percent), Bank of America N.A. (5.0 percent), PNC Bank N.A. (4.7 percent), and the Huntington National Bank (2.4 percent). The bank also competes with local credit unions for small loans to businesses. CNB is not required to report its small business loan data.

As evidenced by unemployment rates, area economic conditions over the evaluation period fared slightly better than the state of Michigan overall. Specifically, in Lansing-East Lansing, unemployment levels ranged from 4.9 percent at the start of 2022 decreasing to 3.8 percent at year-end 2023. In contrast, AA unemployment levels ranged from 3.9 percent at the start of 2024, increasing to 4.4 percent at year-end 2024. In comparison, in the state of Michigan, unemployment levels ranged from 5.0 percent at the start of 2022 decreasing to 3.9 percent at year-end 2023, and increasing to 4.7 at year-end 2024.

The Moody's Analytics Report dated February 2025, reported that the Lansing-East Lansing MSA business cycle was in mid-expansion status. However, after employment growth over most of 2023 and 2024, the area experienced employment losses driven primarily by contracting state government payrolls. While manufacturing and finance sectors did not progress, healthcare continued to advance. Housing prices resumed growing at a solid pace, maintaining a year-over-year trajectory above that of the state and the nation. Area strengths consisted of General Motors commitment to the area and the presence of Michigan State University which served to foster growth in private businesses. Area weaknesses consisted of overreliance on low-growth sectors and limited high-wage opportunities, low per capita income, high poverty rates, outflow of skilled workers, and deteriorating population trends. Top Lansing-East Lansing employers included State University, Sparrow Health System, Auto Owners Insurance Group, General Motors Corporation, Jackson National Life Insurance Company, Peckham Incorporated, and Dart Container Corporation.

Examiners relied on community contact information from a listening session attended by 13 community organizations serving areas including Lansing Michigan, Clinton County Michigan, and the Michigan's Capital Region. Represented community programs encompassed working with small businesses at every development stage from small to mature, including micro and expanding businesses. Programs also involved meeting labor force needs by working with colleges and businesses, job fair participation, and maintaining a portal for seeking workforce development needs. Community organizations focusing on workforce development, cited their targeting of youth, low-and moderate-income adults, and dislocated workers.

Community contacts identified community business needs that included workforce development resources, support for grants and flexible lending for operations and investment. Contacts also advised that businesses with minimal tax obligations may not produce documentation of enough revenue to qualify for traditional financing. Therefore, contacts cited a need for bridge loans and/or flexible, revolving lines of credit and/or non-traditional business loans for businesses seeking small dollar loans. Contacts advised that many businesses do not have business credit cards and cited a need for financial education relative to the importance of establishing credit and types of credit available. Additionally, contacts communicated a post-COVID-19 emergence of entrepreneurship, particularly in the restaurant space. Contacts cited corresponding needs for mentoring, coaching, financial literacy/education, counseling, budget development, and establishing/rebuilding credit. Contacts also advised that bank branch locations are important relative to establishing banking relationships as opposed to seeking financing from predatory financing sources, fintech, and payday lending organizations. Contacts characterized bank and especially credit union representation to be robust, particularly in Lansing.

Lansing AA

Lansing Assessment Area						
2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	136	5.2	20.6	41.9	23.5	8.8
Population by Geography	473,203	3.8	18.1	45.4	27.5	5.3
Housing Units by Geography	203,614	4.5	20.7	46.7	26.2	1.9
Owner-Occupied Housing by Geography	124,356	2.5	15.3	49.4	32.6	0.2
Occupied Rental Units by Geography	64,541	7.2	28.7	43.2	16.3	4.6
Vacant Units by Geography	14,717	9.7	30.6	39.7	15.1	4.9
Businesses by Geography	18,462	4.9	21.6	43.8	26.8	3.0
Farms by Geography	1,016	2.0	11.0	53.1	33.3	0.7
Family Distribution by Income Level	111,157	20.3	17.2	21.9	40.6	0.0
Household Distribution by Income Level	188,897	23.5	16.4	18.8	41.3	0.0
Unemployment rate (%)	5.7	12.8	8.7	5.1	3.1	10.0
Households Below Poverty Level (%)	13.1	28.8	19.7	10.4	7.0	71.1
Median Family Income (29620- Lansing – East Lansing MI MSA)		\$79,497	Median Housing Value			\$148,000
Median Family Income (29620- Lansing – East Lansing MI MSA) for 2024		\$91,300	Median Gross Rent			\$862
			Families Below Poverty Level			7.9
FFIEC File – 2020 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.00%						
(*) The N/A category consists of geographies that have not been assigned an income classification						

Scope of Evaluation 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 performance in the Lansing AA is reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibited excellent geographic distribution of loans.

Small Loans to Businesses

Refer to Table 9 in the state of Michigan section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The bank's record of distributing small loans to businesses among AA geographies of different income levels is excellent.

Small Loans to Businesses 2022-2023

During 2022 and 2023, of small loans to AA businesses originated by the bank, 12.8 percent were originated in low-income geographies. The bank's record of originating small loans to AA businesses in low-income geographies significantly exceeded the percentage of AA businesses located in low-income geographies at 5.1 percent and exceeded the percentage of aggregate lending in low-income AA geographies of 4.7 percent.

Similarly, during 2022 and 2023, of small loans to AA businesses originated by the bank, 37.2 percent were originated in moderate-income geographies. The bank's record of originating small loans to AA businesses in moderate-income geographies significantly exceeded the percentage of AA businesses located in moderate-income geographies at 20.3 percent and exceeded the percentage of aggregate lending in moderate-income AA geographies of 15.9 percent.

Small Loans to Businesses 2024

During 2024, of small loans to AA businesses originated by the bank, 9.5 percent were originated in low-income geographies. The bank's record of originating small loans to AA businesses in low-income geographies significantly exceeded the percentage of AA businesses located in low-income geographies at 4.9 percent.

Similarly, during 2024, of small loans to AA businesses originated by the bank, 26.2 percent were originated in moderate-income geographies. The bank's record of originating small loans to AA businesses in moderate-income geographies exceeded the percentage of AA businesses located in moderate-income geographies at 21.6 percent.

Lending Gap Analysis

The OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of loans. The analysis did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank's record of distributing small loans among AA businesses of different sizes is reasonable.

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.

Small Loans to Businesses 2022-2023

During 2022 and 2023, of small loans to businesses originated by the bank, the percentage of loans originated to AA businesses reporting annual revenues of less than or equal to \$1 million was 40.7 percent. The bank's percentage of loans originated to AA small businesses is significantly below the percentage of all AA businesses that were small at 74.5 percent and is below the aggregate percentage of loans to AA businesses that were small at 51.5 percent.

Small Loans to Businesses 2024

During 2024, of small loans to businesses originated by the bank, the percentage of loans originated to AA small businesses with annual revenues less than or equal to \$1 million was 54.8 percent. The bank's percentage of loans originated to AA small businesses is well below the percentage of all AA businesses that were small at 80.1 percent.

While distribution by income level significantly below (2022 and 2023) and well below (2024) the demographic distribution of AA small businesses, bank lending was below the aggregate loans to AA small businesses in 2022/2023 but closer to aggregate than demographic distribution. Aggregate percentages were unavailable for 2024.

In reaching conclusions, greater weight was placed on comparing the bank's record of lending to AA small businesses against aggregate lending to AA small businesses than the demographic percentage of AA small businesses.

Multiple factors were considered when reaching conclusions regarding the bank's record of lending to AA small businesses. The bank faced a substantial level of competition for AA business loans. Competition for small loans to AA businesses includes competition from larger regional and national lenders including lenders that offer credit cards which are often used by small businesses to facilitate easy access to credit.

Community contacts identified a need for small dollar amount business loans often sought by small businesses. The bank has demonstrated a willingness to originate these smaller dollar amount business loans over the evaluation period. Specifically, of the 226 loans the bank originated in 2022, 2023, and 2024, 16.4 percent were for dollar amounts less than \$50,000, 25.7 percent were for dollar amounts less than \$100,000, 54.9 percent were for dollar amounts less than \$250,000, and 77.0 percent were for dollar amounts less than \$500,000. Higher interest rates may also encourage small businesses to use cash when possible as an alternative to financing funding needs.

Responses to Complaints

There were no CRA complaints received by the bank or the agency since the prior CRA performance evaluation concerning the bank's record in meeting AA credit needs.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSA that received comprehensive examination review, designated by the term “full-scope”.

Time Period Reviewed:	Lending Test: 01/01/22 to 12/31/24	
Bank Products Reviewed:	Small Business	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Michigan		
Lansing AA	Full-scope	Ingham, Clinton, and Eaton Counties

Appendix B: Summary of State Ratings

RATINGS	
Overall Bank:	Lending Test Rating:
Capitol National 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/AA.

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/AA.

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

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 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 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.

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023
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
Lansing AA	86	23,708	100.0	12,928	5.07	12.79	4.74	20.29	37.21	15.86	41.94	29.07	41.23	29.07	17.44	36.35	3.62	3.49	1.82
Total	86	23,708	100.0	12,928	5.07	12.79	4.74	20.29	37.21	15.86	41.94	29.07	41.23	29.07	17.44	36.35	3.62	3.49	1.82

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

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2024
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
Lansing AA	42	7,509	100.0	--	4.91	9.52	--	21.57	26.19	--	43.75	45.24	--	26.76	16.67	--	3.01	2.38	--
Total	42	7,509	100.0	--	4.91	9.52	--	21.57	26.19	--	43.75	45.24	-	26.76	16.67	--	3.01	2.38	--

Source: FFIEC File – 2020 Census; 1/1/2024 – 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, CRA Aggregate Data, 2024 data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
			% of Total	Overall	%	%	%				
	#	\$	Number	Market	Businesses	Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Lansing AA	86	23,708	100.00	12,928	74.51	40.70	51.46	11.94	51.16	13.55	8.14
Total	86	23,708	100.00	12,928	74.51	40.70	51.46	11.94	51.16	13.55	8.14
Source: FFIEC File – 2020 Census; 1/1/2022 – 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, “—” data not available. Due to rounding, totals may not equal 100.0%											

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2024
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	
Lansing AA	42	7,509	100.00	--	80.14	54.76	--	8.81	38.10	11.04	7.14	
Total	42	7,509	100.00	--	80.14	54.76	--	8.81	38.10	11.04	7.14	
Source: FFIEC File – 2024 Census; 1/1/2024 – 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, “—” data not available. Due to rounding, totals may not equal 100.0%												