



PUBLIC DISCLOSURE

May 20, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First National Bank & Trust Co. of Iron Mountain
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 major factors that support this rating include:

- The loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, and the credit needs of its assessment area (AA).
- A substantial majority of loan originations are made within the bank's AA.
- The borrower distribution of loans reflects reasonable distribution among borrowers of different incomes. The borrower distribution of loans reflects reasonable distribution among businesses of different sizes.
- The geographic distribution of home mortgage loans reflects reasonable distribution among geographies. The geographic distribution of businesses loans reflects reasonable distribution among geographies.

Loan-to-Deposit Ratio

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

The bank's quarterly LTD ratio averaged 61.98 percent over the 13 quarters from March 31, 2016 to March 31, 2019. The bank ranks last in a peer group which includes six other similarly situated banks with peer bank LTD ratios ranging from 65.01 percent to 82.00 percent in the specified time period. The banks in this peer group have total assets ranging from \$130 million to \$533 million, with the bank being the second largest in this group with total assets of \$323 million.

Lending in Assessment Area

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

The bank originated and purchased 93.1 percent of its total loans by number and 89.6 percent of its total loans by dollar amount inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. See the chart below for additional detail.

Table D - Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%	\$	%	\$	%		
Home Mortgage										
2016	23	92.0	2	8.0	25	2,763	86.1	445	13.9	3,208
2017/2018	24	92.3	2	7.7	26	2,823	83.9	542	16.1	3,365
Subtotal	47	92.2	4	7.8	51	5,586	85.0	987	15.0	6,573
Small Business										
2016	24	92.3	2	7.7	26	2,591	93.5	180	6.5	2,771
2017/2018	24	96.0	1	4.0	25	2,512	97.2	73	2.8	2,585
Subtotal	48	94.1	3	5.9	51	5,103	95.3	253	4.7	5,356
Total	95	93.1	7	6.9	102	10,689	89.6	1,240	10.4	11,929
<i>Source: Evaluation Period: 1/1/2016 - 12/31/2018 Bank Data</i>										
<i>Due to rounding, totals may not equal 100.0</i>										

Description of Institution

FNB Iron Mountain is a \$323 million bank headquartered in Iron Mountain, Michigan. The bank is wholly owned by FNB Bancshares, Inc. The bank operates six full-service branches, one drive-through branch, and one trust office. The main office and five branches are located in a middle-income census tract (CT). The branch located in Menominee, Michigan is in an upper-income CT. The bank also operates two additional Automated Teller Machines in The Drug Store and Dickinson County Memorial Hospital. No branches were opened or closed since the last CRA examination.

The bank offers a full suite of banking products including non-complex deposit products, one-to four-family mortgages, consumer loans, commercial loans, brokerage services, insurance, and trust services. As of March 31, 2019, the loan portfolio totaled \$171.8 million and represented 53.25 percent of total assets. By dollar volume, the loan portfolio consists of 66.07 percent commercial loans, 28.97 percent residential real estate loans, 4.73 percent consumer loans, and 0.24 percent agricultural loans. Tier 1 capital totals \$29.9 million.

FNB Iron Mountain has one AA, which includes 33 CTs, located in both Michigan and Wisconsin. The AA includes all of Dickinson, Iron, and Menominee Counties in the state of Michigan and all of Florence and Marinette Counties in the state of Wisconsin. The AA does not lie in a metropolitan statistical area (MSA) and is contiguous. Based on the FFIEC's 2018 List of Distressed or Underserved Nonmetropolitan Middle-Income Geographies, the two CTs in Florence County were listed as distressed middle-income CTs due to population loss. Due to the similar demographics and the fact that both areas rely on the same local economy, we combined Michigan and Wisconsin into one AA. The AA complies with regulatory requirements and does not arbitrarily exclude any low- or moderate-income geographies.

There are no legal or financial impediments limiting the bank's ability to meet the credit needs of the AA. FNB Iron Mountain's last CRA evaluation was dated March 14, 2016. Using Intermediate Small Bank procedures, the bank received a Satisfactory rating.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated FNB Iron Mountain's performance under the Small Bank Lending Test. The Lending Test assesses the bank's record of meeting the credit needs of its AA through lending activities. We reviewed data for the bank's primary loan products, commercial loans and home mortgage loans, to evaluate the bank's lending performance.

This evaluation covers the period since the prior CRA examination, March 14, 2016, through May 14, 2019. The Lending Test evaluated loans originated between January 1, 2016 and December 31, 2018.

In order to provide more current and accurate demographic data, the federal banking agencies are now updating census data every five years instead of ten, beginning with the Census Bureau's 2015 American Community Survey (ACS). FNB Iron Mountain's AA was affected by this change, and the data from 2016 received a separate analysis from the 2017 through 2018 lending data. As a result, performance tables have been separated and include 2017 through 2018 analysis only. Data is discussed in the applicable narrative sections of the evaluation.

To evaluate lending, we used data from bank reports and a random sample of home mortgage and business loans originated in the bank's AA. Our lending analysis utilized the most recent available demographic and aggregate peer lending data.

Discriminatory or Other Illegal Credit Practices Review

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

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

Table A – Demographic Information of the Assessment Area						
Assessment Area: FNB Iron Mountain Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	33	0.0	15.2	75.8	9.1	0.0
Population by Geography	108,186	0.0	14.1	76.1	9.8	0.0
Housing Units by Geography	71,792	0.0	23.5	68.8	7.7	0.0
Owner-Occupied Units by Geography	38,890	0.0	14.9	74.7	10.4	0.0
Occupied Rental Units by Geography	9,970	0.0	15.2	81.4	3.4	0.0
Vacant Units by Geography	22,932	0.0	41.7	53.2	5.1	0.0
Businesses by Geography	5,776	0.0	11.2	81.2	7.6	0.0
Farms by Geography	307	0.0	20.8	70.4	8.8	0.0
Family Distribution by Income Level	31,607	19.5	20.8	24.2	35.5	0.0
Household Distribution by Income Level	48,860	25.8	17.8	20.0	36.4	0.0
Median Family Income Non-MSAs - MI		\$51,187	Median Housing Value			\$105,105
Median Family Income Non-MSAs - WI		\$57,005	Median Gross Rent			\$505
			Families Below Poverty Level			8.9%
<i>Source: 2010 U.S. Census and 2016 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>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: FNB Iron Mountain Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	33	0.0	12.1	81.8	6.1	0.0
Population by Geography	106,999	0.0	12.3	81.6	6.2	0.0
Housing Units by Geography	72,585	0.0	16.4	78.4	5.2	0.0
Owner-Occupied Units by Geography	37,378	0.0	12.3	80.6	7.1	0.0
Occupied Rental Units by Geography	9,975	0.0	13.6	81.9	4.6	0.0
Vacant Units by Geography	25,232	0.0	23.5	73.7	2.8	0.0
Businesses by Geography	5,828	0.0	8.8	87.4	3.8	0.0
Farms by Geography	299	0.0	8.4	86.6	5.0	0.0
Family Distribution by Income Level	29,410	19.7	20.3	24.6	35.5	0.0
Household Distribution by Income Level	47,353	26.2	18.1	18.6	37.1	0.0
Median Family Income Non-MSAs - MI		\$53,542	Median Housing Value			\$104,988
Median Family Income Non-MSAs - WI		\$60,911	Median Gross Rent			\$596
			Families Below Poverty Level			9.1%
<i>Source: 2015 ACS Census and 2018 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>						

According to 2010 US Census Data, the bank's AA is comprised of 33 CTs, of which zero are low-income, five (15.15 percent) are moderate-income, 25 (75.76 percent) are middle-income, and three (9.09 percent) are upper-income. The total population of the AA is 108,186, which is comprised of 31,607 families. The number of families at each income level is: 6,171 low-income families (19.52 percent), 6,564 moderate-income families (20.77 percent), 7,640 middle-income families

(24.17 percent), and 11,232 upper-income families (35.54 percent). The average median family income is \$50,315, and the FFIEC 2016 updated MSA median family income is \$55,824. The percentage of families below the poverty level is 8.9 percent. Owner-occupied units comprise 54.17 percent of total housing units. Based on 2016 demographic data, the total number of businesses with reported revenues in this AA was 5,776. Of these businesses, 4,432 (76.73 percent) had gross revenues of \$1 million or less, 400 (6.93 percent) had gross revenues over \$1 million, and 944 (16.34 percent) did not report revenue.

According to the Census Bureau's 2015 ACS, the bank's AA is comprised of 33 CTs, of which zero are low-income, four (12.12 percent) are moderate-income, 27 (81.82 percent) are middle-income, and two (6.06 percent) are upper-income. The total population of the AA is 106,999, which is comprised of 29,410 families. The number of families at each income level is: 5,780 low-income families (19.65 percent), 5,963 moderate-income families (20.28 percent), 7,224 middle-income families (24.56 percent), and 10,443 upper-income families (35.51 percent). The average median family income is \$53,503, and the FFIEC 2017 updated MSA median family income is \$62,561. The percentage of families below the poverty level is 9.1 percent. Owner-occupied units comprise 51.50 percent of total housing units. Based on 2018 demographic data, the total number of businesses with reported revenues in this AA was 5,828. Of these businesses, 4,399 (75.48 percent) had gross revenues of \$1 million or less, 434 (7.45 percent) had gross revenues over \$1 million, and 995 (17.07 percent) did not report revenue.

Employment and Economic Factors

According to Data USA, the largest industries in the AA are health care & social assistance, manufacturing, and retail trade. Manufacturing includes occupations such as paper mills, construction machinery manufacturing, and machine tool manufacturing. Major employers in the AA include Verso Paper, MJ Electric Systems, Dickinson County Healthcare System, and BOSS Snowplow.

The annual unemployment rate as of December 2018 for Dickinson County was 4.0 percent, Iron County was 6.0 percent, Menominee County was 4.1 percent, Florence County was 4.2 percent, and Marinette County was 3.6 percent. The annual unemployment rate for the State of Michigan was 4.1 percent and the State of Wisconsin annual unemployment rate was 2.8 percent during the same time period.

There is moderate competition in the area from several other financial institutions. The bank ranks second for deposit market share when compared to other financial institutions in the AA. The bank's deposit market share as of June 30, 2018 was 13.97 percent. Other competing financial institutions had a deposit market share ranging from 0.52 percent (Upper Peninsula State Bank) to 19.14 percent (The Stephenson National Bank and Trust).

Community Contact

We spoke with a community contact from a local Economic Development Alliance. Overall, the needs of the community are being met by local financial institutions. There is a strong manufacturing base in the area, making up approximately 20 percent of the workforce. With this comes better wages, but there is also the challenge of finding talent in the trades. With manufacturing expanding, there is a need for housing. The contact noted that there is no distinction between the Michigan and Wisconsin border. On the Michigan side, the contact stated that approximately 30-40 percent of the workforce comes from Wisconsin.

LENDING TEST

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

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the AA. The geographic distribution of home mortgage loans reflects reasonable distribution among geographies. The geographic distribution of business loans reflects reasonable distribution among geographies.

Home Mortgage Loans

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

2016 Conclusions

The geographic distribution of home mortgage loans reflects reasonable distribution among geographies. There are no low-income CTs in the bank's AA. Based on our random sample, the bank originated 8.7 percent of home mortgage loans in moderate-income geographies. The percentage of the bank's originated loans is less than the demographics that show 14.9 percent of owner-occupied housing is in moderate-income geographies. The percentage of bank loans is less than aggregate peer lending data, which shows 21.7 percent of peer home mortgage lending was in moderate-income geographies.

2017-2018 Conclusions

The geographic distribution of home mortgage loans reflects reasonable distribution among geographies. There are no low-income CTs in the bank's AA. Based on our random sample, the bank did not originate any loans in moderate-income geographies. We reviewed the bank's loan origination report generated for 2015 through 2018. From our review, we were able to identify an additional six loans made in moderate-income CTs that did not reach our random sample. Therefore, this performance is considered reasonable.

Small Loans to Businesses

Refer to table Q in 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.

2016 Conclusions

The geographic distribution of business loans reflects reasonable distribution among geographies. There are no low-income CTs in the bank's AA. Based on our sample, the bank originated 4.2 percent of small business loans in moderate-income geographies. This percentage is below the demographics which show 11.2 percent of AA businesses are in moderate-income geographies. The percentage of bank loans is below the aggregate peer lending data, which shows 12.1 percent of peer lending was to businesses in moderate-income geographies.

2017-2018 Conclusions

The geographic distribution of business loans reflects reasonable distribution among geographies. There are no low-income CTs in the bank's AA. Based on our random sample, the bank originated 4.2 percent of small business loans in moderate-income geographies. This percentage is less than the demographics,

which show 8.8 percent of AA businesses are in moderate-income geographies. The percentage of bank loans is below the aggregate peer lending data, which shows 9.7 percent of peer lending was to businesses in moderate-income geographies.

Distribution of Loans by Income Level of the Borrower

The bank exhibits reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

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

2016 Conclusions

The borrower distribution of home mortgage loans within the AA reflects reasonable distribution among borrowers of different incomes. The bank originated 17.4 percent of its home mortgages to low-income families, which is less than the demographics that show 19.5 percent of families in the AA are low-income. The percentage of bank loans to low-income families exceeds the aggregate peer lending data, which shows 7.8 percent of peer lending within the AA was to low-income families. Based on our random sample, the bank originated 4.4 percent of home mortgages to moderate-income families, which is below the demographics that show 20.8 percent of families in the AA are moderate-income. The bank's lending is also below the aggregate peer lending data, which shows 20.3 percent of peer lending within the AA was to moderate-income families.

2017-2018 Conclusions

The borrower distribution of home mortgage loans within the AA reflects reasonable distribution among borrowers of different incomes. The bank originated 4.2 percent of its home mortgages to low-income families, which is below the demographics that show 19.7 percent of families in the AA are low-income. The percentage of bank loans to low-income families is below the aggregate peer lending data which shows 8.8 percent of peer lending within the AA was to low-income families. The bank originated 25.0 percent of home mortgages to moderate-income families, which is exceeds the demographics that show 20.3 percent of families in the AA are moderate-income. The bank's lending also exceeds the aggregate peer lending data, which shows 20.6 percent of peer lending within the AA was to moderate-income families.

Small Loans to Businesses

Refer to table R in 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.

2016 Conclusions

The borrower distribution of loans reflects excellent distribution among businesses of different sizes. Our random sample shows the bank originated 83.3 percent of its business loans to AA small businesses (business with gross annual revenues of \$1.0 million or less). The bank's lending exceeds the demographics that shows 76.7 percent of AA businesses are small businesses. The bank's lending also exceeds the aggregate peer lending data, which shows 45.9 percent of peer business lending in the AA was to small businesses.

2017-2018 Conclusions

The borrower distribution of loans reflects reasonable distribution among businesses of different sizes. Our random sample shows the bank originated 75.0 percent of its business loans to AA small businesses. The bank's lending is in line with the demographics that shows 75.5 percent of AA businesses are small businesses. The bank's lending exceeds the aggregate peer lending data, which shows 56.1 percent of peer business lending in the AA was to small businesses.

Responses to Complaints

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

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:	January 1, 2016 through December 31, 2018	
Bank Products Reviewed:	Home mortgage and small business	
Affiliate(s)	Affiliate Relationship	Products Reviewed
<i>None</i>		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Non-MSA	Full-scope	Full counties of Dickinson, Iron, and Menominee in Michigan. Full counties of Florence and Marinette in Wisconsin.

Appendix B: Summary of MMSA and State Ratings

RATINGS	The First National Bank & Trust Co. of Iron Mountain
Overall Bank:	Lending Test Rating:
Satisfactory	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																2017-2018		
Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	% 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	24	2,823	100.0	0.0	0.0	0.0	12.3	0.0	15.7	80.6	100.0	77.7	7.1	0.0	6.6	0.0	0.0	0.0
Total	24	2,823	100.0	0.0	0.0	0.0	12.3	0.0	15.7	80.6	100.0	77.7	7.1	0.0	6.6	0.0	0.0	0.0

Source: 2015 U.S Census; 01/01/2017 – 12/31/2018 Bank 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																2017-2018		
Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	% of House-holds	% Bank Loans	Aggregate	% of House-holds	% Bank Loans	Aggregate	% of House-holds	% Bank Loans	Aggregate	% of House-holds	% Bank Loans	Aggregate	% of House-holds	% Bank Loans	Aggregate
Non-MSA	24	2,823	100.0	19.7	4.2	8.8	20.3	25.0	20.6	24.6	33.3	20.8	35.5	37.5	34.5	0.0	0.0	15.3
Total	24	2,823	100.0	19.7	4.2	8.8	20.3	25.0	20.6	24.6	33.3	20.8	35.5	37.5	34.5	0.0	0.0	15.3

Source: 2015 U.S Census; 01/01/2017 – 12/31/2018 Bank 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																			2017-18	
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	
Non-MSA	24	2,511	100.0	1,211	0.0	0.0	0.0	8.8	4.2	9.7	87.4	91.7	85.8	3.8	4.1	4.5	0.0	0.0	0.0	
Total	24	2,511	100.0	1,211	0.0	0.0	0.0	8.8	4.2	9.7	87.4	91.7	85.8	3.8	4.1	4.5	0.0	0.0	0.0	

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 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											2017-2018	
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	
Non-MSA	24	2,511	100.0	1,211	75.5	75.0	56.1	7.4	16.7	17.1	8.3	
Total	24	2,511	100.0	1,211	75.5	75.0	56.1	7.4	16.7	17.1	8.3	

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; "--" data not available Due to rounding, totals may not equal 100.0