



PUBLIC DISCLOSURE

October 27, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

County National Bank
Charter Number: 14062

One South Howell Street
Hillsdale MI, 49242

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 community development 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 and small loans to businesses among borrowers of different incomes, reasonable geographic distribution of home mortgages and small loans to businesses, a substantial majority of loans in the bank's (Assessment Areas) AAs, and a reasonable loan-to-deposit (LTD) ratio.
- The Community Development (CD) Test rating is based on adequate responsiveness to the community needs through qualified CD loans, investments, services, and its capacity to participate in community development activities within their market.

Loan-to-Deposit Ratio

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

County National Bank's (CNB or bank) quarterly average LTD ratio of the 16 quarters since the prior CRA evaluation (January 1, 2022, through December 31, 2024) is 87.0 percent. The LTD ratio ranged from a low of 74.0percent as of March 31, 2022, to a high of 99.1 as of September 30, 2024. The bank's quarterly average LTD ratio of 87.0 percent is reasonable compared to peer institutions within their AA. The peer group included four other institutions under \$2 billion in assets within the bank's AA. The quarterly average for the peer institutions over the evaluation period was 76.1percent, with CNB maintaining the second highest quarterly average LTD ratio over the evaluation period. Additionally, there was strong competition from other financial institutions during the evaluation period.

Lending in Assessment Area

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

The bank originated and purchased 84.0 percent of its total loans by volume inside the bank's AAs during the evaluation period of 2022 through 2023. The bank originated 81.4 percent of the total loans by volume inside the bank's AAs during the evaluation period of 2024. Due to changes in the bank's AA during the evaluation period the OCC have broken the review into the periods of 2022 through 2023 and 2024. 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.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	446	85.3	77	14.7	523	78,003	76.4	24,093	23.6	102,096
Small Business	44	73.3	16	26.7	60	11,291	75.3	3,695	24.7	14,986
Total	490	84.0	93	16.0	583	89,294	76.3	27,888	23.8	117,082

*Source: 1/1/2022 - 12/31/2023 Bank Data.
Due to rounding, totals may not equal 100.0%*

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	149	82.8	31	17.2	180	30,362	75.8	9,698	24.2	40,060
Small Business	22	73.3	8	26.7	30	2,591	50.8	2,514	49.2	5,105
Total	171	81.4	39	18.6	210	32,953	73.0	12,212	27.0	45,165

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

Description of Institution

CNB is a full-service intrastate community bank headquartered in Hillsdale, Michigan. The bank is a wholly owned subsidiary of CNB Community Bancorp Inc., a one-bank holding company, which is also headquartered in Hillsdale, Michigan. As of December 31, 2024, the bank had \$1.3 billion in total assets, and tier one capital totaled \$106.5 million or 8.2 percent of total assets. The bank has three AAs all of which are in Michigan. Its primary AA is the Michigan non-MSA AA, which consists of Hillsdale and Lenawee counties and is located in a Non-Metropolitan Statistical Area (MSA). The Jackson MSA AA consists of Jackson County and includes the entire Jackson MSA. The Battle Creek MSA AA contains two contiguous census tracts (CTs) located in Calhoun County which is part of the Battle Creek MSA. The bank operates 14 full-service branch locations with an additional four offsite ATM locations with its AAs.

CNB's primary loan products are residential real estate loans and small loans to businesses. During the evaluation period net loans and leases increased from \$792.3 million to \$1.03 billion. As of December 31, 2024, the loan portfolio was primarily comprised of loans secured by real estate (\$761.1 million), which was further segmented into non-farm/non-residential (\$313.9 million), 1-4 family residential (\$300.0 million), and construction and development loans (\$80.3 million).

CNB's total deposits increased to \$1.1 billion as of December 31, 2024. As of December 31, 2024, \$565.8 million of the bank's deposits were located in the Michigan non-MSA AA, \$425.9 million were located in the Jackson MSA AA, and \$55.8 million were located in the Battle Creek MSA AA.

CNB offers traditional home loan products, including home mortgage loans, personal loans, consumer loans, and home equity lines of credit (HELOC). The bank also offers commercial loans including commercial real estate, equipment financing, operating lines of credit, agricultural including both Farm Service Agency (FSA) and United States Department of Agriculture (USDA)-guaranteed, and small business association (SBA) secured loans. The bank's consumer deposit-related products and services include checking, savings, money market, certificates of deposit, and individual retirement accounts (IRA). Digital banking includes online bill payment, mobile banking, account transfers, check deposit, and ATM services. Business-related deposit products and services include checking and savings accounts,

certificates of deposit and ATM and debit cards. Business online services include account transfers, wire transfers, ACH payroll, and bill pay. There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs of the AAs. The bank received a "Satisfactory" rating on their previous Community Reinvestment Act (CRA) performance evaluation dated September 19, 2022.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The OCC conducted a CRA performance evaluation to assess the bank's record of meeting the credit needs of its entire community, including LMI areas. The OCC performed a full-scope review using Intermediate Small Bank CRA examination procedures. This performance evaluation assesses CNB's record of meeting the credit and community development needs of its AAs. The OCC analyzed lending activity in full-year increments during the evaluation period, January 1, 2022, through December 31, 2024.

The bank's primary lending products reviewed within our assessment are 1-4 family mortgage loans and loans to small businesses. Based on call report data as of December 31, 2024, loans secured by 1-4 family residential real estate totaled \$265.0 million or 25.3 percent of total loans and leases. CRA eligible small business and farms loans totaled \$182.60 million or 17.44 percent of total loans and leases. Within the evaluation period the bank originated or purchased \$20.1 million of small business loans. These loans originated within the evaluation period were used to complete our analysis of the bank's small business lending.

Based on the bank's internal reports for lending activity during the evaluation period, it was determined that the bank's primary lending focus during the evaluation period was home mortgage and small loans to businesses. While the bank offers many loan products including multi-family, home equity, and consumer installment loans, these products are considered primary product for the purpose of CRA evaluation, and as a result are not considered in this evaluation.

To evaluate the bank's performance, the OCC used all Home Mortgage Disclosure Act (HMDA) Loan Application Registers (LARs) for the years 2022, 2023, and 2024 to analyze the bank's home mortgage performance. The OCC also reviewed the bank's performance in meeting the small business lending needs of its AAs conducting an analysis of the bank's small business lending within the review period. For each AA, examiners conducted separate analyses. For analysis purposes, this report compared the bank's lending performance to demographic data from the 2020 U.S. Census data, 2024 U.S. Census data, and 2024 Dun & Bradstreet SBSF Demographic data. No affiliate activity was included in the analysis. The OCC also considered information from community contacts to help assess the needs of the bank's AAs. Refer to the table in appendix A, Scope of the Examination, for more information on the scope of the review.

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 assessment areas located within the same metropolitan statistical area (MSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each regarding how full-

scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The state rating in rating areas with multiple AAs are based on the weighted-average conclusions in those AAs. Refer to the “Scope” section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

The OCC assessed information from the following performance criteria when assessing the bank’s primary lending products: loan-to-deposit ratio, lending within the AAs, lending to borrowers of different incomes, and geographic distribution of borrowers. The most weight was placed on the full-scope lending areas of Michigan non-MSA AA and the Jackson MSA AA, as they comprise the majority of the bank’s deposit and lending activity.

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 Community Development Test is rated Satisfactory

The major factors that support this rating include:

- The bank's distribution of home mortgage loans and small loans to businesses to borrowers of different income levels is reasonable.
- The bank's geographic distribution of home mortgage loans and small loans to businesses is reasonable.
- The bank's loan-to-deposit ratio is reasonable.
- The bank made a substantial majority of loans inside its AAs.
- The bank originated an adequate level of CD loans, investments, and services.

Description of Institution's Operations in Michigan

The bank has three separate AAs located in southern Michigan. The bank's primary AA is the Michigan non-MSA AA centered in Hillsdale and Lenawee counties. The Jackson MSA AA consists of the entirety of the Jackson County and the Jackson MSA. The Battle Creek MSA consists of two contiguous census tracts located in Calhoun County, which is part of the Battle Creek MSA.

Within its AA the bank has 14 branch locations as of December 31, 2024. During the evaluation period the bank opened up one new full-service branch and relocated a branch in the Jackson MSA AA, and relocated one drive thru branch in the Michigan non-MSA AA. Each branch, with the exception of the Homer and Carleton drive-up, has an onsite deposit-taking ATM. Every branch also offers drive-through services. The bank also has additional deposit taking ATMs in Brooklyn, Hillsdale, Homer, and Pittsford, Michigan.

Community Contacts

The OCC contacted with a local agency focused on self-sufficiency, including weatherization, community development, income tax-assistance, emergency aid, parent education, elementary success, and other community outreach programs. Additionally, examiners contacted an affordable housing agency. One of the major concerns of the community organizations in the area was a lack of affordable housing and inability to obtain reasonable mortgages in livable homes. The contacts noted that financial institutions have been involved in the community but the residual impacts of COVID-19 continue to impact the area.

Michigan Non-MSA AA

Assessment Area(s) - MI Non-MSA 2023						
						2022-2023
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	38	0.00	15.79	65.79	18.42	0.00
Population by Geography	145,169	0.00	15.79	64.70	19.51	0.00
Housing Units by Geography	65,949	0.00	15.10	64.77	20.13	0.00
Owner-Occupied Housing by Geography	44,192	0.00	11.52	64.76	23.72	0.00
Occupied Rental Units by Geography	12,681	0.00	29.37	62.45	8.19	0.00
Vacant Units by Geography	9,076	0.00	12.60	68.05	19.35	0.00
Businesses by Geography	3,589	0.00	18.06	62.39	19.56	0.00
Farms by Geography	445	0.00	5.17	69.44	25.39	0.00
Family Distribution by Income Level	37,814	17.07	19.02	22.07	41.84	0.00
Household Distribution by Income Level	56,873	19.30	17.60	19.16	43.94	0.00
Unemployment rate (%)	4.60	0.00	4.79	4.94	3.49	0.00
Households Below Poverty Level (%)	11.79	0.00	23.92	11.13	4.60	0.00
Median Family Income (Non-MSAs - MI)		\$64,965			Median Housing Value	\$124,800
Median Family Income (Non-MSAs - MI) for 2023		\$79,800			Median Gross Rent	\$762
					Families Below Poverty Level	8.63
FFIEC File - 2020 Census						
2023 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Assessment Area(s) - MI Non-MSA 2024						
						2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	38	0.00	13.16	63.16	23.68	0.00
Population by Geography	145,169	0.00	14.12	58.99	26.90	0.00
Housing Units by Geography	65,949	0.00	13.47	59.76	26.77	0.00
Owner-Occupied Housing by Geography	44,192	0.00	9.97	58.45	31.58	0.00
Occupied Rental Units by Geography	12,681	0.00	27.15	58.92	13.93	0.00
Vacant Units by Geography	9,076	0.00	11.38	67.30	21.32	0.00
Businesses by Geography	4,241	0.00	15.92	56.19	27.89	0.00
Farms by Geography	521	0.00	3.45	66.99	29.56	0.00
Family Distribution by Income Level	37,814	16.19	18.50	21.86	43.46	0.00
Household Distribution by Income Level	56,873	18.64	17.15	19.18	45.03	0.00
Unemployment rate (%)	4.60	0.00	4.95	5.01	3.66	0.00
Households Below Poverty Level (%)	11.79	0.00	25.18	12.14	4.36	0.00
Median Family Income (Non-MSAs - MI)		\$63,042			Median Housing Value	\$124,800
Median Family Income (Non-MSAs - MI) for 2024		\$78,300			Median Gross Rent	\$762
					Families Below Poverty Level	8.63
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

The Michigan non-MSA AA comprised of Hillsdale and Lenawee Counties had no low-income census tracts based on the 2023 and 2024 census data. During the period of 2022 through 2023 the AA had six moderate-income census tracts which declined to five moderate-income census tracts in 2024. As of 2024 the AA had 24 middle-income census tracts and nine upper-income census tracts. CNB’s headquarters is located in Hillsdale, Michigan, and a majority of the bank’s branches are located in the Hillsdale-Lenawee AA.

According to the 2024 US Census data the AA had a population of 145,169, with 14.1 percent of the population living in moderate-income census tracts, 59.0 percent in middle-income census tracts, and 26.9 percent in upper-income census tracts. The population within the AA has remained relatively stable with slight increases since the prior evaluation period. The median housing value in the AA was \$124,800. Based on the median family income in the AA of \$78,300, low-income families make less than \$39,150 (individual income that is less than 50 percent of the area median family income) and moderate-income families make at least \$39,150 but less than \$62,640 (individual income that is at least 50 percent and less than 80 percent of the area median family income). Overall median housing values are approximately 2.0 to 3.2 times the median family income of the LMI families in the AA.

Banking competition within the AA is strong. According to the 2024 FDIC Deposit Market Share report the bank had \$565.8 million in deposits, totaling a 25.4 percent market share. CNB has the highest market share of financial institutions within the AA. There were 12 financial institutions operating 27 branch locations within the market. Other institutions operating within the AA include Premier Bank, Old National Bank, The Huntington National Bank, and Southern Michigan Bank & Trust. The top five financial institutions represent 77.2 percent of the market share in the AA.

Based on 2024 peer aggregate home mortgage lending data, CNB was ranked 7 of 227 with a 3.2 percent market share in the AA. Over the evaluation period, the bank originated or purchased 37.3 percent of their home mortgage loans in this AA. The top five lenders have a market share of 34.1 percent. The five largest lenders include TLC Community Credit Union, Rocket Mortgage, GVC Mortgage, Inc., Huntington National Bank, and Old National Bank.

Jackson MSA AA

Assessment Area(s) – Jackson MSA AA 2023						
						2022-2023
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	46	6.52	30.43	32.61	26.09	4.35
Population by Geography	160,366	4.10	27.55	38.59	25.16	4.59
Housing Units by Geography	69,719	4.58	29.39	38.52	26.28	1.23
Owner-Occupied Housing by Geography	46,231	1.76	23.51	42.98	31.66	0.09
Occupied Rental Units by Geography	15,985	11.32	47.96	29.00	8.29	3.43
Vacant Units by Geography	7,503	7.62	25.99	31.35	31.41	3.63
Businesses by Geography	4,011	3.14	30.24	37.67	23.34	5.61
Farms by Geography	242	0.00	11.16	57.02	31.40	0.41
Family Distribution by Income Level	39,908	18.75	19.04	20.95	41.27	0.00
Household Distribution by Income Level	62,216	22.67	16.94	18.39	42.00	0.00
Unemployment rate (%)	6.27	12.59	7.07	6.46	4.10	17.81
Households Below Poverty Level (%)	12.45	44.36	17.94	8.55	5.37	51.70
Median Family Income (27100 - Jackson, MI MSA)		\$67,657			Median Housing Value	\$135,550
Median Family Income (27100 - Jackson, MI MSA) for 2023		\$82,700			Median Gross Rent	\$778
					Families Below Poverty Level	8.59
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Assessment Area(s) – Jackson MSA AA 2023						
2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Assessment Area(s) – Jackson MSA AA 2024						
2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	46	6.52	30.43	32.61	26.09	4.35
Population by Geography	160,366	4.10	27.55	38.59	25.16	4.59
Housing Units by Geography	69,719	4.58	29.39	38.52	26.28	1.23
Owner-Occupied Housing by Geography	46,231	1.76	23.51	42.98	31.66	0.09
Occupied Rental Units by Geography	15,985	11.32	47.96	29.00	8.29	3.43
Vacant Units by Geography	7,503	7.62	25.99	31.35	31.41	3.63
Businesses by Geography	4,696	3.32	29.07	37.69	23.98	5.94
Farms by Geography	302	0.33	10.26	58.61	30.46	0.33
Family Distribution by Income Level	39,908	18.75	19.04	20.95	41.27	0.00
Household Distribution by Income Level	62,216	22.67	16.94	18.39	42.00	0.00
Unemployment rate (%)	6.27	12.59	7.07	6.46	4.10	17.81
Households Below Poverty Level (%)	12.45	44.36	17.94	8.55	5.37	51.70
Median Family Income (27100 - Jackson, MI MSA)		\$67,657			Median Housing Value	\$135,550
Median Family Income (27100 - Jackson, MI MSA) for 2024		\$84,300			Median Gross Rent	\$778
					Families Below Poverty Level	8.59
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

The Jackson MSA AA, based on 2024 U.S. Census data, consists of 46 individual census tracts. The AA is comprised of three low-income census tracts and 14 moderate-income census tracts. The AA has 15 middle-income and 12 upper-income census tracts.

According to the 2024 US Census data the AA had a population of 160,366, with 4.1 percent of the populations living in low-income census tracts, 27.6 percent of the population living in moderate-income census tracts, 38.6 percent in middle-income census tracts, and 25.2 percent in upper-income census tracts. The population within the AA has remained relatively stable with slight increases since the prior evaluation period. The median housing value in the AA was \$135,550. Based on the median family income in the AA of \$84,300, low-income families make less than \$42,150 (individual income that is less than 50 percent of the area median family income) and moderate-income families make at least \$42,150 but less than \$67,440 (individual income that is at least 50 percent and less than 80 percent of the area median family income). Overall median housing values are approximately 2.0 to 3.2 times the median family income of the LMI families in the AA.

Banking competition within the AA is strong. According to the 2024 FDIC Deposit Market Share report the bank had \$425.9 million in deposits and an 18.0 percent market share. CNB has the third highest market share of financial institutions within the AA. There were 12 financial institutions operating 32 branch locations within the market. Other institutions operating within the AA include Flagstar Bank, Comerica Bank, Huntington National Bank, and Fifth Third Bank. The top five financial institutions represent 87.6 percent of the market share in the AA.

Based on 2024 peer aggregate home mortgage lending data, CNB was ranked 10 of 212 with a 2.6 percent market share in the AA. Over the evaluation period, the bank originated or purchased 27.6 percent of their home mortgage loans in this AA. The top five lenders have a market share of 28.8 percent. The five largest

lenders include Rocket Mortgage, True Community Credit Union, Huntington National Bank, United Wholesale Mortgage, and Flagstar Bank.

Scope of Evaluation in Michigan

The OCC performed a full-scope evaluation for the Michigan non-MSA and the Jackson MSA AA. Limited-scope reviews were completed on the Battle Creek AA. Between the two full-scope AAs more weight was placed on performance within the Jackson MSA AA due to the greater distribution of LMI borrowers and the presence of low-income CTs. Home mortgage lending and loans to small businesses are the bank's primary lending product and was evaluated under the Lending Test. The OCC used the HMDA LAR and CRA Loan Register from 2022, 2023, and 2024 for the lending analysis. Refer to the Scope of the Evaluation for more details.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MICHIGAN

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's lending performance in the state of Michigan was reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibited reasonable geographic distribution of loans in the state.

Home Mortgage Loans

Refer to Table 7 in the state of Michigan section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Michigan Non-MSA AA

CNB's distribution of home mortgage loans among census tracts of different income levels in the Michigan Non-MSA AA during the 2022 to 2023 evaluation period and 2024 evaluation period is poor. There were no low-income CTs within this AA, and as a result the OCC more heavily weighed performance within the moderate-income census tracts. During the evaluation period, the percentage of home mortgage loans originated or purchased by the bank was below both the demographic and aggregate peer lending percentages to moderate-income CTs. Additionally, the bank's performance when compared to aggregate data declined throughout the evaluation period.

Jackson MSA AA

CNB's distribution of home mortgage loans among census tracts of different income levels in the Jackson MSA AA during the 2022 to 2023 evaluation period and 2024 evaluation period is excellent. During the evaluation period, the percentage of home mortgage loans originated or purchased by the bank in low-

income CTs exceeded demographic and aggregate lending data for the period of and more than doubled peer aggregate percentage in the 2024 evaluation period. The bank's lending in moderate-income CTs was lower than demographic and aggregate peer levels in the 2022 to 2023 evaluation period, but improved to be consistent with both the demographic and aggregate lending during 2024.

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.

Michigan Non-MSA AA

CNB's distribution of small business loans within the AA was reasonable in the evaluation period. Examiners noted that the bank had limited lending opportunities in low-income CTs, as there were no low-income CTs in this AA. During the 2022 to 2023 evaluation period, bank small business lending was slightly below the aggregate lending and below demographic data in moderate-income CTs. In 2024, the bank's small business lending remained below the overall percentage of businesses in moderate-income CTs. Aggregate data was not available for 2024.

Jackson MSA AA

CNB's distribution of small business loans within the MSA was excellent for the evaluation period. In the 2022 to 2023, the bank was slightly below both aggregate and demographic data in low-income CTs. However, the bank significantly exceeded the aggregate and demographic data for lending in moderate-income census tracts. In 2024, the bank lending was slightly below the percentage of businesses in low-income CTs, but significantly exceeded the percentage of businesses in moderate-income CTs. Aggregate data was not available for 2024.

Lending Gap Analysis

Overall, the OCC did not identify any unexplained, conspicuous gaps in the lending distribution. The OCC reviewed internal bank reports and maps to identify potential significant gaps in the distribution of loans over the evaluation period.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table 8 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.

Michigan Non-MSA AA

CNB's distribution of home mortgage loans to borrowers of different income levels in the Michigan Non-MSA AA during the evaluation period is reasonable. The aggregate HMDA data reflects loan penetration

exceeding aggregate peer lending percentages to low- and moderate-income borrowers. The bank's distribution of home mortgage lending to low-income borrowers was below demographic data in 2022 to 2023, but improved to be consistent with demographic percentages in 2024. The bank's distribution of home mortgage lending to moderate-income borrowers exceeds demographic and aggregate levels.

Jackson MSA AA

CNB's distribution of home mortgage loans to borrowers of different income levels in the Jackson MSA AA during the evaluation period is reasonable. In 2022 to 2023, lending to LMI borrowers was consistent with both demographic and aggregate peer lending levels. In 2024, the bank's distribution of home mortgage lending to low-income borrowers dropped below demographic and aggregate peer data, but the bank's distribution of home mortgage lending to moderate-income borrowers significantly exceeded both demographic and aggregate peer lending.

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.

Michigan Non-MSA AA

CNB's distribution of small business loans of different sizes in the Michigan Non-MSA AA was reasonable. The bank is primarily a mortgage lender that offers small business loans to businesses within their community. In the 2022 to 2023 evaluation period, small business lending to businesses with revenues below \$1 million exceeded the aggregate lending, but was below the demographic data. This improved in 2024 and the percent of small business loans to businesses with less than \$1 million in revenue exceeded demographic data. No aggregate small business data was available in 2024.

Jackson MSA AA

CNB's distribution of small business loans of different sizes in the Jackson MSA AA was reasonable. In the 2022 to 2023 evaluation period the bank's percentage of small business loans to businesses with revenues less than \$1 million was below the aggregate. The bank was significantly below demographic data, but aggregate lending was also significantly below demographic data. CNB improved lending to businesses less with revenues less than \$1 million in 2024, but remained below demographic data. No aggregate small business data was available in 2024.

Responses to Complaints

CNB has not received any complaints about its CRA performance in helping to meet the AAs' credit needs during the evaluation period.

Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Battle Creek MSA AA was consistent with the bank's overall performance under the Lending Test in the full scope area(s). There are no LMI CTs within the bank's AA within the Battle Creek MSA, limiting opportunities to lend within LMI CTs within the AA. However, the bank's performance in lending to borrowers of different income levels was stronger than the full-scope AAs during the 2022 to 2023 evaluation period. The bank has limited lending activity within the Battle Creek MSA AA, and it mostly centered on the border region of Hillsdale County.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the state of Michigan is rated Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope and limited-scope reviews, the bank exhibited excellent responsiveness community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AAs.

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Michigan Non-MSA AA	7	21.2%	\$15,506	78.2%
Jackson MSA AA	26	78.8%	\$4,322	21.8%
Total	33	100.0%	\$19,828	100.0%

During the evaluation period, CNB demonstrated adequate responsiveness to the community development needs of its AAs and broader state and regional area. The bank originated 33 loans totaling \$19.8 million in qualified CD loans in the Michigan Non-MSA AA and the Jackson MSA AA. These loans were primarily focused on economic revitalization and providing housing and educational support to LMI borrowers.

The following are examples of CD loans the bank originated or purchased in this AA:

- The bank provided \$10.0 million to a local college targeted at providing financial aid to LMI borrowers which comprise greater than 50 percent of the student body.

- Provided \$1.1 million in financing to a community health center which provides a free clinic and healthcare services to low-income and uninsured members of the community.
- Provided \$3.9 million over 25 loans to a local developer, which is for the construction of affordable housing in conjunction with a public program that provides housing to borrowers that earn less than 80 percent of the median income with home prices capped at \$175,000. The program is designed to meet the housing and revitalization needs of the community.

Number and Amount of Qualified Investments

Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Michigan Non-MSA	0	0	108	6,835	108	68.8	6,835	77.8	0	0
Jackson MSA	7	1,845	34	106	41	26.1	1,951	22.2	0	0
Battle Creek MSA	0	0	8	2	8	5.1	2	0.0	0	0
Total	7	1,845	150	6,943	157	100.0	8,788	100.0	0	0

The Qualified Investment Table, shown above, set forth the information and data used to evaluate the bank's level of qualified investments. These tables include all qualified investment, including prior period investments that remain outstanding as of the end of evaluation period.

During the evaluation period, CNB made a satisfactory level of CD investments which had a neutral impact on its overall lending performance in the AA. The bank also made an approximately \$167,200 in donations within the bank's AA. The following are examples of qualified investments in the AA:

The following are examples of qualified investments in the AA:

- The bank invested \$6.7 million into school districts with majority LMI student bodies, with an additional \$1.8 million in prior period investments. These school districts were primarily located in Hillsdale and Lenawee Counties.

Extent to Which the Bank Provides Community Development Services

CNB provides a reasonable level of CD services. 24 employees and/or directors provided financial expertise to 22 different community development organizations across the bank's AA. Bank employees provided approximately 559.5 service hours to these organizations which included affordable housing, community services, economic development, and revitalization / stabilization. Bank employees primarily served in board and leadership positions.

* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, the bank's performance under the CD Test in the Battle Creek MSA AA was weaker than the bank's overall performance under the CD Test in the full scope areas. This performance was primarily due to the bank's limited geographic footprint in the Battle Creek MSA AA, with only two CTs in the AA.

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(s) and non-MSA(s) that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	01/01/2022 to 12/31/2024	
Bank Products Reviewed:	Home mortgages and small business lending Community development loans, investments, donations, and services	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Michigan		
Michigan Non-MSA AA	Full-Scope	Hillsdale County (all CTs) and Lenawee County (all CTs)
Jackson MSA AA	Full-Scope	Jackson County (all CTs)
Battle Creek MSA AA	Limited-Scope	Calhoun County (0030.00, 0031.00)

Appendix B: Summary of State Ratings

RATINGS			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Community National Bank	Satisfactory	Satisfactory	Satisfactory
State:			
Michigan	Satisfactory	Satisfactory	Satisfactory

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

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 the Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including low- and moderate-income areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): Loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a ‘male householder’ and no wife present) or ‘female householder’ (a family with a ‘female householder’ and no husband present).

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of CD loans and qualified investments, branch distribution, and CD services).

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

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a Core Based Statistical Area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

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

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

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

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rating Area: A rated area is a state or multistate metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan statistical area, the institution will receive a rating for the multistate metropolitan statistical area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original

amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

Upper-Income: Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Appendix D: Tables of Performance Data

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 7. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table 8. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/AA. The table also presents aggregate peer data for the years the data is available.
- Table 9. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** – Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s AA.
- Table 10. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: (1) the percentage distribution of businesses with revenues of greater than \$1 million; and, (2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

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

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2023		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate		
Battle Creek MSA 2023	16	2,044	3.59	178	--	--	--	--	--	--	49.43	68.75	56.74	50.57	31.25	43.26	--	--	--		
Jackson MSA 2023	212	39,557	47.53	7,946	1.76	2.36	1.89	23.51	16.51	25.14	42.98	47.64	42.68	31.66	32.55	29.95	0.09	0.94	0.34		
MI Non-MSA 2023	218	36,403	48.88	7,135	--	--	--	11.52	8.72	12.88	64.76	82.11	61.54	23.72	9.17	25.58	--	--	--		
Total	446	78,003	100.00	15,259	0.89	1.12	0.98	17.36	12.11	19.12	53.55	65.25	51.66	28.15	21.08	28.06	0.04	0.45	0.18		

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

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2024		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate		
Battle Creek MSA 2024	4	578	2.68	87	--	--	--	--	--	--	49.43	50.00	50.57	50.57	50.00	49.43	--	--	--		
Jackson MSA	72	15,349	48.32	3,759	1.76	5.56	2.18	23.51	23.61	24.79	42.98	26.39	43.02	31.66	44.44	29.58	0.09	--	0.43		
MI Non-MSA 2024	73	14,435	48.99	3,055	--	--	--	9.97	6.85	12.54	58.45	82.19	52.96	31.58	10.96	34.50	--	--	--		
Total	149	30,362	100.00	6,901	0.89	2.68	1.19	16.62	14.77	19.06	50.52	54.36	47.51	31.93	28.19	32.01	0.04	--	0.23		

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

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2022 – 2023		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Battle Creek MSA 2023	16	2,044	3.59	178	18.97	12.50	7.30	22.13	37.50	24.16	18.97	37.50	32.58	39.93	12.50	26.40	--	--	9.55
Jackson MSA 2023	212	39,557	47.53	7,946	18.75	16.98	15.10	19.04	25.00	25.42	20.95	23.58	22.48	41.27	33.96	25.27	--	0.47	11.73
MI Non-MSA 2023	218	36,403	48.88	7,135	17.07	14.68	8.49	19.02	23.39	22.30	22.07	25.23	23.95	41.84	34.86	32.11	--	1.83	13.15
Total	446	78,003	100.00	15,259	17.95	15.70	11.92	19.08	24.66	23.95	21.45	24.89	23.28	41.52	33.63	28.48	--	1.12	12.37

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2024		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Battle Creek MSA 2024	4	578	2.68	87	18.97	--	8.05	22.13	--	29.89	18.97	75.00	24.14	39.93	25.00	28.74	--	--	9.20
Jackson MSA	72	15,349	48.32	3,759	18.75	5.56	10.30	19.04	33.33	23.68	20.95	20.83	21.84	41.27	40.28	28.52	--	--	15.67
MI Non-MSA 2024	73	14,435	48.99	3,055	16.19	16.44	7.89	18.50	26.03	21.05	21.86	20.55	25.86	43.46	36.99	31.26	--	--	13.94
Total	149	30,362	100.00	6,901	17.53	10.74	9.20	18.83	28.86	22.59	21.35	22.15	23.65	42.29	38.26	29.73	--	--	14.82

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, -- HMDA Aggregate Data, "--" data not available.

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																		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	
Battle Creek MSA 2023	10	1,566	1.39	77	--	--	--	--	--	--	62.19	80.00	53.25	37.81	20.00	46.75	--	--	--	
Jackson MSA 2023	415	92,257	57.80	3,682	3.78	2.17	2.58	28.61	33.49	29.36	41.63	27.71	38.54	19.11	30.12	25.69	6.87	6.51	3.83	
MI Non-MSA 2023	293	50,525	40.81	3,225	--	--	--	19.37	12.63	14.36	61.93	78.84	61.49	18.70	8.53	24.16	--	--	--	
Total	718	144,348	100.00	6,984	1.85	1.25	1.36	23.61	24.51	22.11	52.01	49.30	49.30	19.17	21.17	25.51	3.36	3.76	2.02	

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 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	
Battle Creek MSA 2024	10	867	3.82	--	--	--	--	--	--	--	57.39	60.00	--	42.61	40.00	--	--	--	--	
Jackson MSA	148	33,144	56.49	--	4.91	4.05	--	26.20	37.16	--	46.33	32.43	--	13.76	19.59	--	8.79	6.76	--	
MI Non-MSA 2024	104	15,753	39.69	--	--	--	--	15.92	12.50	--	56.19	70.19	--	27.89	17.31	--	--	--	--	
Total	262	49,765	100.00	--	2.07	2.29	--	20.01	25.95	--	52.05	48.47	--	22.16	19.47	--	3.70	3.82	--	

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%

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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Battle Creek MSA 2023	10	1,566	1.39	77	77.55	40.00	55.84	15.31	60.00	7.14	--	
Jackson MSA 2023	415	92,257	57.80	3,682	73.77	46.99	50.46	13.11	40.72	13.11	12.29	
MI Non-MSA 2023	293	50,525	40.81	3,225	74.84	59.73	58.82	12.84	24.57	12.32	15.70	
Total	718	144,348	100.00	6,984	74.32	52.09	54.38	13.02	34.40	12.67	13.51	
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	
Battle Creek MSA 2024	10	867	3.82	--	81.74	60.00	--	12.17	30.00	6.09	10.00	
Jackson MSA	148	33,144	56.49	--	77.13	52.03	--	11.56	45.27	11.31	2.70	
MI Non-MSA 2024	104	15,753	39.69	--	78.50	79.81	--	10.40	19.23	11.11	0.96	
Total	262	49,765	100.00	--	77.97	63.36	--	10.91	34.35	11.11	2.29	
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%												