PUBLIC DISCLOSURE

February 23, 2026

COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION

Macatawa Bank, N.A.
Charter Number: 25333

10753 Macatawa Drive
Holland, MI 49424

Office of the Comptroller of the Currency

Regional and Midsize Financial Institutions
400 7th Street SW
Washington D.C., 20219

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.

Contents

Overall CRA Rating

Institution's CRA Rating: This institution is rated Outstanding.

The following table indicates the performance level of Macatawa Bank, N.A. with respect to the Lending, Investment, and Service Tests:

	Macatawa Bank, N.A. Performance Tests		
Performance Levels	Lending Test*	Investment Test	Service Test
Outstanding	X	X	
High Satisfactory			
Low Satisfactory			X
Needs to Improve			
Substantial Noncompliance			

*The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based on excellent performance in the state of Michigan, with excellent responsiveness to assessment area (AA) needs, a good geographic distribution of loans, and an adequate borrower distribution of loans. The bank was a leader in making community development (CD) loans, which had a significantly positive impact on the Lending Test conclusion.

- The Investment Test rating is based on the performance in the state of Michigan and reflects an excellent responsiveness to credit and community economic development needs through the origination of qualified investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

- The Service Test rating is based on performance in the state of Michigan which reflects service delivery systems that were reasonably accessible to geographies and individuals of different income levels. The bank provided a relatively high level of CD services.

Lending in Assessment Area

A small percentage of the bank's loans were in its AA.

The bank originated and purchased 18.4 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Nationwide lending programs are used by the bank, which impact the ratio of loans located inside the bank's AA. The bank purchases loans from an affiliate. First Insurance Funding (FIRST) loans are originated by Lake Forest Bank & Trust, N.A. and the majority are sold to other affiliate banks. During the evaluation period, the bank purchased 25,128 loans from FIRST. A substantial majority of FIRST loans are originated outside the bank's AA and revenue data was not provided.

The primary lending product based on volume of loans by number is small business loans. Conclusions regarding lending inside and outside the AA are factored into the analysis of the distribution of lending by income level of the geography.

Table 1: Lending Inside and Outside of the Assessment Area										2021 - 2025
Loan Category	Number of Loans				Total #	Dollar Amount of Loans $(000s)				Total $(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		$	%	$	%	
Home Mortgage	2,398	90.32	257	9.68	2,655	556,676	84.72	100,439	15.28	657,115
Small Business	3,183	11.31	24,953	88.69	28,136	761,079	38.63	1,208,943	61.37	1,970,022
Small Farm	105	60.34	69	39.66	174	26,220	72.36	10,016	27.64	36,236
Total	**5,686**	**18.36**	**25,279**	**81.64**	**30,965**	**1,343,975**	**50.46**	**1,319,398**	**49.54**	**2,663,373**
Source: 1/1/2021 - 12/31/2025 Bank Data.										
Due to rounding, totals may not equal 100.0%										

Description of Institution

Macatawa Bank, National Association (MB or the bank) is an approximately $3.7 billion intrastate bank headquartered in Holland, MI. MB is a wholly owned subsidiary of Wintrust Financial Corporation (WFC), a financial services holding company headquartered in Rosemont, Illinois. On August 1, 2024, WFC completed its acquisition of Macatawa Bank Corporation. As of December 31, 2025, WFC reported approximately $71.1 billion in total consolidated assets. WFC operates through a community banking model, consisting of 16 wholly-owned banking affiliates, with more than 200 bank branch locations. WFC's market coverage is primarily concentrated in the Chicago metropolitan area, with additional banking and lending operations in southeastern Wisconsin, northwest Indiana, and west-central Michigan.

WFC locations provide a wide range of lending and deposit products and services to their customers. WFC residential mortgage applications are referred to Wintrust Mortgage (WM), a division of Barrington Bank & Trust Company, N.A. WM is a national residential mortgage operation with offices throughout the United States, offering a wide variety of retail mortgages and originating nearly all WFC mortgages. Loans that cannot be sold on the secondary market are purchased by any one of the 16 WFC banks for their portfolio.

WFC provides niche lending products across the nation within their community banks. These specialty products include wealth management advisory services, commercial insurance premium financing through FIRST, lease financing, short-term account receivable financing, administrative services, franchise lending, firm partnership loans, and financial solutions for mission-based organizations.

As of December 31, 2025, MB reported total loans of $2.7 billion, representing 73.2 percent of total assets. MB has three primary loan types that make up 94.3 percent of the total loan portfolio. The bank's primary loan products include approximately $1.9 billion of commercial loans or 69 percent of total loans, $430.8 million in residential lending or 15.9 percent of the total loan portfolio, and $255.8 million of consumer loans or 9.4 percent of total loans. Tier 1 capital totaled $355.5 million.

The bank operates 25 full-service locations, one limited-service location, and 26 deposit-taking Automated Teller Machines (ATMs). Since the last examination, MB closed one limited-service drive-up branch in its AA located in a middle-income census tract (CT).

There were no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AA during the evaluation period. MB was purchased by WFC in 2024. There were no other acquisitions or mergers during the evaluation period that would have affected the bank's CRA performance or the OCC's analysis. MB's CRA performance was rated "Satisfactory" in the last Public Evaluation, dated May 24, 2021.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period is from January 1, 2021, through December 31, 2025, for the Lending Test, and from May 25, 2021, through December 31, 2025, for CD activities. This performance evaluation assesses the bank's performance for all products and services, under the Large Bank CRA procedures for Lending, Investment, and Service Tests for the entirety of the evaluation period.

Lending Test

In evaluating lending performance, the OCC analyzed home mortgage loans that management reported under Home Mortgage Disclosure Act (HMDA) and small loans to businesses and farms reported under CRA. Primary loan products, for purposes of this review, are products in which the bank originated at least 20 loans within an AA during one or more of the analysis periods within the overall evaluation period.

For the Lending Test, three analysis periods are considered to evaluate the geographical and borrower distribution of loans. These split analysis periods result from updates to the U.S. Census, specifically the transition from the 2015 American Community Survey (ACS) to the 2020 U.S. Census, as well as the Office of Management and Budget's revised delineations of Metropolitan Statistical Areas (MSAs), Micropolitan Statistical Areas, and Combined Statistical Areas (CSAs) as of July 21, 2023. The updates to the Census information changes the demographic and aggregate comparators for geographic and borrower distribution of loans, thus split analysis periods are needed to accurately assess performance in these two Lending Test components. The analysis periods for geographical and borrower distribution of loans are January 1, 2021, to December 31, 2021, January 1, 2022, to December 31, 2023, and January 1, 2024, to December 31, 2025.

Investment Test

When conducting analysis under the Investment Test, the OCC compared the dollar amount of CD investments and donations made to tier 1 capital. The analysis also included evaluating how responsive investments and donations were to the needs of the community and if there were any impediments to meeting those needs. The OCC considered the volume of investments made during the current evaluation period and those made in prior evaluation periods that remained outstanding. Investments made in a prior period were considered at the book value of the investment as of December 31, 2025. Current-period investments were considered at their original investment amount, even if that amount is greater than the current book value of the investment. Current-period investment totals are based on the amount used for bank reporting for financial statements and the Consolidated Reports of Condition and Income that governed the timing for recognizing investment totals. Unfunded commitments consist of legally binding investment commitments that are tracked and recorded in the bank's financial reporting system.

Service Test

The OCC gave primary consideration to the bank's performance in delivering retail products and services to geographies and individuals of different income levels through the bank's distribution of branches. The OCC focused on the accessibility of branches to low- and moderate-income (LMI) geographies and individuals, including the impact of opening and closing of branches. Adjacent branches, which are branches in middle- or upper-income (MUI) census tracts within proximity of LMI geographies, that serve and enhance accessibility for LMI customers, were also considered. The OCC evaluated the range and consistency of products and services offered by the bank through its branch network with emphasis on accessibility to LMI borrowers. The OCC specifically focused on any differences in branch hours and services in LMI geographies compared to those in MUI geographies. The OCC also evaluated the bank's record of providing CD services. The OCC's primary consideration was the responsiveness of the services to community needs.

Selection of Areas for Full-Scope Review

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

Ratings

The bank's overall rating is a blend of the state ratings.

Under the Lending Test, the OCC considered both the number and dollar volume of loans to determine the weighting of loan products. In terms of the number of loans, small loans to businesses made up 55.9 percent of the total number of loans, compared to 42.2 percent for home mortgages and 1.8 percent for small loans to farms. In terms of dollar volume, small loans to businesses constituted 56.6 percent of the total loan amount, while home mortgages accounted for 41.4 percent, and small loans to farms made up 1.9 percent. As a result, the OCC gave greater weight to small loans to businesses, while small loans to farms were given the least weight.

When determining the conclusions for the geographical and borrower distribution of loans, the OCC assigned equal weight to all three analysis periods. Although the 2021 analysis period covers only a single year, it accounts for 35.6 percent of the total number of loans and 30.7 percent of the total dollar volume of loans made during the entire evaluation period.

Generally, equal emphasis is given to the geographic distribution and borrower distribution of loans by income level. Greater weight was generally given to the bank's performance compared to aggregate lenders than to performance relative to demographic factors in lending, unless other performance context factors indicate greater consideration should be given to demographics. The analysis included both the number and dollar volume of lending. The analysis of lending, except for CD loans, emphasized the number of loans rather than the dollar volume because it is a better indicator of the number of businesses and individuals served.

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's) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area 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 or any affiliate whose loans have been considered as part of this institution's lending performance 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: Outstanding
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending activity reflected excellent responsiveness to credit needs in its AA.
- The bank exhibited a good geographic distribution and an adequate borrower distribution of loans in its AA.
- The bank was a leader in making CD loans. The bank's CD lending had a significantly positive impact on the lending test conclusions.
- The bank had an excellent level of qualified investments, including grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.
- Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution's AA.
- The bank provided a relatively high level of CD services.

Description of Institution's Operations in Michigan

MB delineated one AA in the State of Michigan. The AA consists of contiguous census tracts located within Kent, Ottawa, and Allegan Counties. Kent and Ottawa Counties are included in the Grand Rapids-Wyoming-Kentwood MSA (Grand Rapids MSA), while Allegan County is a non-metropolitan county that is economically integrated with the broader regional market, aligned with the greater Grand Rapids-Wyoming CSA (Grand Rapids CSA). The AA is legal and does not arbitrarily exclude any LMI CTs. Please refer to Appendix A for a description of the AA.

During the 2021 analysis period, of the 207 census tracts within the AA, 12 tracts (5.8 percent) were classified as low-income, 34 tracts (16.4 percent) as moderate-income, 107 tracts (51.7 percent) as middle-income, 52 tracts (25.1 percent) as upper-income, and two tracts (1 percent) were not assigned an income classification (NA).

During the 2022–2023 analysis period, of the 241 census tracts within the AA, 11 tracts (4.6 percent) were classified as low-income, 40 tracts (16.6 percent) as moderate-income, 120 tracts (49.8 percent) as middle-income, 65 tracts (27 percent) as upper-income, and five tracts (2.1 percent) were not assigned an income classification (NA).

During the 2024–2025 analysis period, of the 241 census tracts within the AA, 10 tracts (4.2 percent) were classified as low-income, 38 tracts (15.8 percent) as moderate-income, 118 tracts (49 percent) as middle-income, 70 tracts (29.1 percent) as upper-income, and five tracts (2.1 percent) were not assigned an income classification (NA).

Grand Rapids CSA

The following table provides a summary of demographics, housing, and business information for the AA.

Assessment Area(s) - Grand Rapids CSA						
						2021
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	207	5.80	16.43	51.69	25.12	0.97
Population by Geography	1,008,563	4.69	15.00	52.18	28.13	0.00
Housing Units by Geography	401,763	3.83	15.82	53.72	26.63	0.00
Owner-Occupied Housing by Geography	268,145	1.76	10.87	55.17	32.20	0.00
Occupied Rental Units by Geography	102,992	8.16	28.78	50.26	12.81	0.00
Vacant Units by Geography	30,626	7.43	15.60	52.61	24.35	0.00
Businesses by Geography	40,943	3.11	13.39	49.25	34.25	0.00
Farms by Geography	1,850	1.03	5.89	56.38	36.70	0.00
Family Distribution by Income Level	256,144	18.25	17.06	22.11	42.58	0.00
Household Distribution by Income Level	371,137	21.46	16.35	18.41	43.78	0.00
Unemployment rate (%)	7.09	16.95	9.15	6.84	5.06	0.00
Households Below Poverty Level (%)	12.36	46.21	21.30	10.46	6.44	0.00
Median Family Income (24340 - Grand Rapids-Wyoming-, MI MSA)		$64,496			Median Housing Value	$137,200
Median Family Income (Non-MSAs - MI)		$53,628			Median Gross Rent	$790
Median Family Income (24340 - Grand Rapids-Wyoming-, MI MSA) for 2021		$76,600			Families Below Poverty Level	9.09
Median Family Income (Non-MSAs - MI) for 2021		$62,900				

FFIEC File - 2010 Census
2021 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) - Grand Rapids CSA						
						2022 - 2023
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	241	4.56	16.60	49.79	26.97	2.07
Population by Geography	1,074,676	4.14	15.65	48.41	30.96	0.84
Housing Units by Geography	419,214	3.37	15.86	49.91	29.72	1.14
Owner-Occupied Housing by Geography	291,282	1.61	12.01	49.97	35.40	1.00
Occupied Rental Units by Geography	102,026	8.24	26.33	51.13	12.87	1.43
Vacant Units by Geography	25,906	3.90	17.89	44.43	32.26	1.52
Businesses by Geography	32,720	2.14	16.06	46.40	34.70	0.70
Farms by Geography	1,436	0.56	8.29	50.63	39.83	0.70
Family Distribution by Income Level	270,017	17.52	17.64	23.20	41.64	0.00
Household Distribution by Income Level	393,308	21.16	16.27	19.35	43.22	0.00
Unemployment rate (%)	4.32	10.70	5.88	3.76	3.61	6.15
Households Below Poverty Level (%)	9.37	32.25	16.07	8.54	4.57	11.20
Median Family Income (24340 - Grand Rapids-Wyoming-Kentwood, MI MSA)		$80,705			Median Housing Value	$184,800
Median Family Income (Non-MSAs - MI)		$64,965			Median Gross Rent	$907
Median Family Income (24340 - Grand Rapids-Wyoming-Kentwood, MI MSA) for 2023		$97,500			Families Below Poverty Level	6.21
Median Family Income (Non-MSAs - MI) for 2023		$79,800				

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) - Grand Rapids CSA						
						2024 - 2025
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	241	4.15	15.77	48.96	29.05	2.07
Population by Geography	1,074,676	3.69	14.83	47.73	32.91	0.84
Housing Units by Geography	419,214	3.00	15.10	49.24	31.52	1.14
Owner-Occupied Housing by Geography	291,282	1.31	11.16	48.99	37.54	1.00
Occupied Rental Units by Geography	102,026	7.67	25.66	51.61	13.64	1.43
Vacant Units by Geography	25,906	3.66	17.83	42.72	34.27	1.52
Businesses by Geography	34,861	2.05	15.79	43.51	37.92	0.73
Farms by Geography	1,568	0.70	7.84	48.02	43.05	0.38
Family Distribution by Income Level	270,017	17.09	17.32	22.94	42.65	0.00
Household Distribution by Income Level	393,308	20.81	16.10	19.28	43.82	0.00
Unemployment rate (%)	4.32	11.42	5.59	3.92	3.57	6.15
Households Below Poverty Level (%)	9.37	33.85	16.80	8.68	4.56	11.20
Median Family Income (24340 - Grand Rapids-Wyoming-Kentwood, MI MSA)		$79,594	Median Housing Value			$184,800
Median Family Income (Non-MSAs - MI)		$63,042	Median Gross Rent			$907
Median Family Income (24340 - Grand Rapids-Wyoming-Kentwood, MI MSA) for 2025		$103,900	Families Below Poverty Level			6.21
Median Family Income (Non-MSAs - MI) for 2025		$81,900				

FFIEC File - 2024 Census
2025 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

Community Contact

As part of the CRA evaluation, the OCC reviewed information from six community contacts conducted during the evaluation period. These contacts included representatives from city government, small business development centers, and nonprofit organizations focusing on affordable housing, economic development, and community services.

The contacts identified several needs and opportunities within the Grand Rapids CSA, including:

- Affordable housing, which was the most frequently mentioned need
- Funding small businesses and startups
- Creative, flexible, and innovative lending products for consumers and homebuyers
- Financial literacy education within the local school system

Housing Units

In 2021, the Grand Rapids CSA had 401,763 housing units, with 19.7 percent located in LMI census tracts. Owner-occupied units, though the majority overall, comprised only 12.6 percent in LMI areas, potentially limiting homeownership opportunities for LMI households and influencing demand for affordable mortgage products.

In 2023, the number of housing units increased to 419,214, with 19.2 percent in LMI tracts. Owner-occupied units in these areas rose slightly to 13.6%, yet the limited availability could still restrict homeownership for LMI families and impact mortgage product demand.

In 2025, the housing unit count remained at 419,214, but the proportion in LMI tracts decreased to 18.1%. The percentage of owner-occupied units in LMI areas dropped to 12.5%, continuing to pose challenges for LMI household homeownership and affecting demand for affordable mortgages.

Housing Affordability

Based on demographic information for the Grand Rapids MSA and non-MSA areas in Michigan, the 2021 median family incomes were $76,600 and $62,900, respectively, resulting in income thresholds of $38,300 for low-income families and $61,280 for moderate-income families in the MSA, and $31,450 and $50,320 in non-MSA areas. Housing affordability was calculated using a method that assumed monthly principal and interest payments should not exceed 30 percent of the applicant's income, leading to maximum monthly mortgage payments of approximately $958 for low-income families and $1,532 for moderate-income families in the MSA, and $787 and $1,258 in non-MSA areas. With a 30-year fixed-rate mortgage at 6 percent interest and excluding other costs, the estimated payment on a home valued at $137,200 would be $823. This suggests the median-valued home is generally affordable for moderate-income families and potentially attainable for some low-income families; however, taxes, insurance, and qualification requirements impact affordability. Furthermore, 9.1 percent of families live below the poverty level, limiting homeownership opportunities for the lowest-income households.

In 2023, median family incomes rose to $97,500 in the MSA and $79,800 in non-MSA areas, adjusting thresholds to $48,750 for low-income families and $78,000 for moderate-income families in the MSA, and $39,900 and $63,840 in non-MSA areas. Applying the same affordability benchmark, maximum mortgage payments would be $1,219 for low-income families and $1,950 for moderate-income families in the MSA, and $998 and $1,596 in non-MSA areas. With a median housing value of $184,800, estimated monthly payments are $1,103, suggesting affordability for moderate-income families and potential attainability for some low-income families in the MSA; however, additional costs could affect affordability, particularly for lower-income households in non-MSA areas.

In 2025, median family incomes were projected at $103,900 in the MSA and $81,900 in non-MSA areas, resulting in thresholds of $51,950 for low-income families and $83,120 for moderate-income families in the MSA, and $40,950 and $65,520 in non-MSA areas. Using the same benchmark, maximum monthly mortgage payments would be $1,299 and $2,078 for low- and moderate-income families in the MSA, and $1,024 and $1,638 in non-MSA areas. With a median housing value of $184,000, estimated payments remain $1,103, indicating affordability for moderate-income families and potential attainability for some low-income families in both areas; however, taxes, insurance, and qualification requirements still affect overall affordability.

Employment and Economic Factors

According to the U.S. Bureau of Labor Statistics, employment conditions within the AA varied across Kent, Ottawa, and Allegan Counties, throughout the 2021–2025 evaluation period. Following elevated unemployment during the pandemic, county unemployment rates generally declined before showing some moderation. In Kent County, the unemployment rate slightly decreased from pandemic levels and averaged 3 percent by 2023 before rising to 4.3 percent in 2024 and to 5.3 percent in mid-2025. Ottawa County's annual unemployment rate was 2.9 percent in 2023 and increased to 4.1 percent in 2024, with mid-2025 showing a rate of 5.1 percent. In Allegan County, the annual unemployment rate was 3.6 percent in 2023 and increased to 4.2 percent in 2024. By mid-2025, the unemployment rate rose to 5.2 percent.

According to Moody's Analytics as of October 2025, the Grand Rapids-Wyoming-Kentwood MSA serves as a primary economic driver in western Michigan, supported by a broad and diversified industry base. The metro economy is anchored by manufacturing along with healthcare, education and professional and business services. Major healthcare systems and higher education institutions, including Corewell Health and Grand Valley State University, provide employment stability and contribute to a skilled labor force and represent a larger share of employment than the national average. Moody's reports moderate population growth, competitive business costs, and a balanced mix of manufacturing and service-providing industries. These factors contribute to steady economic performance, employer retention, and continued commercial and residential development activity within the metropolitan area.

Scope of Evaluation in the State of Michigan

The Grand Rapids CSA was selected for analysis using full-scope procedures because it is the only AA in the rating area. Ratings are based on results of the full-scope area.

The OCC gave greater weight to small loans to businesses due to the high lending volume. Home mortgage loans received less weight than small loans to businesses but more weight than small farm loans. Small farm loans received the least weight due to the lower volume of lending.

For the analysis of distribution of loans to geographies with different income levels, greater consideration was given to the bank's performance in moderate-income geographies due to the higher percentages of owner-occupied housing units, small businesses, and small farms.

For the borrower distribution analysis of home mortgage loans, consideration was given to the impact that income and housing costs have on limiting homeownership opportunities of LMI individuals and families. Additionally, consideration was given to the impact of home affordability for LMI borrowers in higher cost areas when comparing the distribution of home mortgage loans to the demographics. It is difficult for many LMI borrowers to afford a home as the area's median housing value is typically too high for conventional mortgage loan qualification. As such, more emphasis was placed on the bank's lending results to LMI borrowers relative to the aggregate performance rather than the demographic data.

For the borrower distribution of loans to small businesses, the OCC considered the competitive market condition in the AA. Large interstate banks, regional banks, and community banks compete for this business in the AA. The large number of competing banks and dominance from the top five lenders affects the bank's ability to make small loans to businesses. A meaningful portion of the bank's small loans to businesses did not contain revenue information, as permitted under the CRA reporting requirements. Many of these loans were purchased from FIRST, for which revenue data was not provided, or they were originated under a loan product where business revenue is not considered in the underwriting process. The OCC considered the bank's prominent nationwide niche lending programs when evaluating its performance in lending within its AA compared to outside AA lending. More emphasis was placed on the bank's lending relative to aggregate performance.

For the borrower distribution of loans to small farms, the OCC evaluated the competitive market conditions within the AA. Similar to the small business lending environment, the presence of numerous competing banks and the dominance of the top five lenders affects the bank's capacity to extend small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MICHIGAN

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Grand Rapids CSA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Table 3: Lending Activity							2021-2025
Number of Loans							
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development***	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Grand Rapids CSA	2,398	3,183	105	36	5,722	99.98	100.00
Broader Statewide or Regional Area	0	0	0	1	1	0.02	0.00
Total	**2,398**	**3,183**	**105**	**37**	**5,723**	**100.00**	**100.00**
Dollar Volume of Loans ($000s)							
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Grand Rapids CSA	556,676	761,079	26,220	190,889	1,534,864	99.87	100.00
Broader Statewide or Regional Area	0	0	0	2,000	2,000	0.13	0.00
Total	**556,676**	**761,079**	**26,220**	**192,889**	**1,536,864**	**100.00**	**100.00**
Source: 1/1/2021 - 12/31/2025 Bank Data. Due to rounding, totals may not equal 100.00%							

* CD Loans are reviewed from 5/25/21 through 12/31/25.

According to the FDIC's June 30, 2025, Deposit Market Share report, MB had $2.9 billion in deposits with a deposit market share of 9.3 percent. The bank's deposit market share ranked fourth out of 25 deposit taking institutions. MB's deposit market share ranked in the top 16 percent of all deposit taking institutions within the Grand Rapids CSA. The top five institutions by deposit market share were The Huntington National Bank (18.3 percent), Fifth Third Bank, N.A. (17.2 percent), Northpointe Bank (14.2 percent), Macatawa Bank, N.A. (9.3 percent), and JPMorgan Chase Bank, N.A. (9.0 percent). These five institutions had a combined deposit market share of 67.9 percent.

According to 2024 peer mortgage data, MB had a 1.5 percent market share of home mortgage originations. MB's market share of home mortgage originations was weaker than its deposit market share. MB's mortgage originations are ranked 12th out of 418 home mortgage lenders. The bank's market share ranking of home mortgage loan originations, relative to all home mortgage lenders, was in the top 3 percent. MB's market share ranking of home mortgage loan originations was stronger than its deposit market share. The top five home mortgage lenders by number of loans and market share were Lake Michigan Credit Union (21.1 percent), Huntington National Bank (7 percent), Fifth Third Bank, N.A. (4.9 percent), United Wholesale Mortgage (4.4 percent), and Rocket Mortgage (4.1 percent). These five institutions had a combined home mortgage loan market share of 41.4 percent.

According to 2023 peer small business data, MB had a 2 percent market share of small business loan originations. MB's market share of small business loan originations was weaker than its deposit market share. MB's market share of small business loan originations ranked 11th out of 108 small business loan lenders. The bank's market share ranking of small business loan originations relative to all small business loan lenders was in the top 11 percent. The bank's market share ranking of small business loan originations was stronger than its deposit market share ranking. The top five small business lenders by number of loans and market share were JPMorgan Chase Bank, N.A. (25.2 percent), American Express National Bank (19.8 percent), Capital One, N.A. (8.7 percent), US Bank N.A. (5.4 percent), and Synchrony Bank (5.3 percent). The five institutions had a combined small business loan market share of 64.4 percent.

According to 2023 peer small farm data, MB had a 5.2 percent market share of small farm loan originations. MB's market share of small farm loan originations was weaker than its deposit market share. MB's market share of small farm loan originations ranked sixth out of 24 small farm loan lenders. The bank's market share ranking of small farm loan originations relative to all small farm loan lenders was in the top 25 percent. The bank's market share ranking of small farm loan originations was weaker than its deposit market share ranking. The top five small farm lenders by number of loans and market share were JPMorgan Chase Bank, National Association (30.5 percent), John Deere Financial, FSB (18.9 percent), US Bank N.A. (15.8 percent), Capital One, N.A. (7.8 percent), and The Huntington National Bank (7.2 percent). These five institutions had a combined small farm loan market share of 80.1 percent.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AAs, given performance context.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans was poor. The OCC considered the acquisition of the bank by WFC in late 2024. Notably, despite the bank's poor overall performance, there was a significant improvement starting in 2025, with the bank's lending to LMI geographies exceeding both the percentage of owner-occupied housing and the aggregate distribution of loans.

When considering 2025 data only, the bank's percentage of home mortgage loans was 2.1 percent in low-income tracts, exceeding the 1.3 percent owner-occupied homes in those geographies and 1.9 percent aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was 14.1 percent, exceeding 11.2 percent owner-occupied homes in those geographies and 12.3 percent aggregate distribution of loans.

For 2024 through 2025, the bank's percentage of home mortgage loans in low-income geographies was well below the percentage of owner-occupied homes in those geographies and was significantly below the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was below both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

For 2022 through 2023, the bank's percentage of home mortgage loans in low-income geographies was significantly below both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was significantly below both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

For 2021, the bank's percentage of home mortgage loans in low-income geographies was significantly below both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was well below both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was excellent. Included in this analysis were 929 Payment Protection Plan (PPP) loans totaling $80.5 million to small businesses located in the AA that provided support during the COVID-19 pandemic.

For 2024 through 2025, the bank's percentage of small loans to businesses in low-income geographies was below the percentage of businesses in those geographies but exceeded the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was below the percentage of businesses in those geographies but was near to the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2021, the bank's percentage of small loans to businesses in low-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses in those geographies and the aggregate distribution of loans.

Small Loans to Farms

Refer to Table 11 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 farms.

The geographic distribution of small loans to farms was poor.

For 2024 through 2025, the bank originated and/or purchased a total of 37 small loans to farms in the AA. The bank did not make any small loans to farms located in LMI geographies.

For 2022 through 2023, the bank originated and/or purchased a total of 39 small loans to farms in the AA. The bank did not make any small loans to farms located in LMI geographies.

For 2021, the bank originated and/or purchased a total of 29 small loans to farms in the AA. The bank did not make any small loans to farms located in low-income geographies. The percentage of small loans to farms in moderate-income geographies exceeded both the percentage of farms in those geographies and the aggregate distribution of loans.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any conspicuous lending gaps existed. We did not identify any conspicuous lending gaps inside the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an adequate distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the institution and performance context.

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.

The distribution of home mortgage loans among individuals of different income levels was good. Examiners considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low-income families.

For 2024 through 2025, the bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and approximated the aggregate distribution of loans.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families but approximated the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and was near to the aggregate distribution of loans.

For 2021, the bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but was near to the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and approximated the aggregate distribution of loans.

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 origination and purchase of small loans to businesses.

The distribution of small loans to businesses of different sizes was poor. Included in this analysis were 929 PPP loans totaling $80.4 million to small businesses located in in the AA that provided support during the COVID-19 pandemic.

For 2024 through 2025, the bank did not collect or consider the gross annual revenues in the underwriting of 14.2 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of $1 million or less was well below both the percentage of businesses with gross annual revenues of $1 million or less and the aggregate distribution of small loans to businesses.
For 2022 through 2023, based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of $1 million or less was well below both the percentage of businesses with gross annual revenues of $1 million or less and the aggregate distribution of small loans to businesses.

For 2021, the bank did not collect or consider the gross annual revenues in the underwriting of 59.7 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of $1 million or less was significantly below the percentage of businesses with gross annual revenues of $1 million or less and was well below the aggregate distribution of small loans to businesses.

Small Loans to Farms

Refer to Table 12 in the state of Michigan section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution of small loans to farms of different sizes was poor.

For 2024 through 2025, the bank did not collect or consider the gross annual revenues in the underwriting of 2.7 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with revenues of $1 million or less was well below both the percentage of farms with gross annual revenues of $1 million or less and the aggregate distribution of small loans to farms.

For 2022 through 2023, based on those farms with known revenues, the bank's percentage of small loans to farms with revenues of $1 million or less was well below both the percentage of farms with gross annual revenues of $1 million or less and the aggregate distribution of small loans to farms.

For 2021, based on those farms with known revenues, the bank's percentage of small loans to farms with revenues of $1 million or less was well below the percentage of farms with gross annual revenues of $1 million or less but was near to the aggregate distribution of small loans to farms.

Community Development Lending

The institution was a leader in making CD loans.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 36 CD loans totaling 190.9 million, which represented 53.7 percent of the allocated tier 1 capital. CD loans primarily supported community services and economic development during the evaluation period. By dollar volume, 42.1 percent funded community services targeted to LMI individuals, 26 percent funded economic development, 16.7 percent of these loans funded affordable housing, and 15.2 percent funded revitalization and stabilization efforts. The bank's CD lending had a significantly positive impact on the Lending Test conclusion.

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

- The bank originated two loans totaling $35 million to support the expansion of an organization providing mental health services primarily to LMI individuals. Through the PATH program (Projects for Assistance in Transition from Homelessness), over 50 percent of clients receive financial aid, potentially covering full-service costs. The organization addresses mental health, substance abuse, and psychiatric issues and was expanding its facility to accommodate more clients. These loans ensure timely progress on the expansion, enhancing mental health support in the community.

- The bank originated a $10 million loan to a limited dividend housing association developing a 45-unit property, with 36 units designated as low-income housing tax credit (LIHTC) for residents earning 30 to 60 percent of the Kent County AMI. Situated in a moderate-income CT in southeast Grand Rapids, the project includes 23 one-bedroom, 17 two-bedroom, and five three-bedroom units. Supported by local partnerships and LIHTCs from the Michigan State Housing Development Authority, this development aims to provide safe, sustainable housing for Kent County's unhoused or inadequately housed residents.

- The bank originated a $4 million loan to support an organization dedicated to aiding local food pantries and nutritional education for LMI families across West Michigan. In 2024, the organization facilitated 1,625 mobile food pantries and supported 118 youth programs providing meals for children on weekends and during school breaks. These efforts highlight the organization's ongoing commitment and growth in addressing food insecurity in West Michigan.

- The bank provided a $600,000 line of credit to support a nonprofit organization serving the Townline area of Kentwood, MI, where 92 percent of families qualify for federal assistance, 42 percent of children live at the poverty level, and 20 percent experience food insecurity. The funds support the organization's mission to promote health and wellness. Its six-acre campus includes a food center, community garden, after-school programs, free tutoring, entrepreneurial training, cooking and exercise classes, and a medical clinic.

<u>Broader Statewide Regional CD lending</u>

Because MB was responsive to CD needs and opportunities in its AA, examiners considered CD loans in the broader statewide and regional areas that include the bank's AA, but do not have a purpose, mandate, or function to specifically serve the AA. CD lending in the broader statewide area consisted of a single $2 million loan that supported revitalization and stabilization efforts. This CD loan had a neutral impact and supported the Lending Test conclusion.

Product Innovation and Flexibility

The institution uses innovative and/or flexible lending practices in order to serve AA credit needs.

Consumer Loan Program

Money Smart Everyday Loan is offered as an alternative to payday loans. These loans provide unsecured financing from $500 to $2,500 with lower interest rates and up to 24-month repayment terms. During the evaluation period, the bank originated/renewed 24 Money Smart Everyday loans in the AA totaling $87,150.

Money Smart Certificate of Deposit Secured Loan is offered to assist persons with derogatory credit or no credit history who are unable to qualify for traditional bank products. The loan proceeds are used to open a certificate of deposit which is then used to secure the loan. After payoff, customers receive use of the money from the certificate of deposit and benefit from positive reporting of credit history. Features of the loan include low loan amounts, no loan fees, low fixed rates, no required credit history, no required length of residency, and no required proof of income. During the evaluation period, the bank originated/renewed three Money Smart Certificate of Deposit loans in the AA totaling $2,000.

Small Business Loan Program

Small Business Easy Access Line of Credit (LOC) was built specifically for businesses less than a year old and is designed to offer micro businesses short-term cash to support inventory growth and accounts receivable. The loan can be secured or unsecured to accommodate small businesses in a variety of stages and circumstances. The LOC is a flexible financing solution up to $10,000 at a variable rate lower than most credit cards, with additional tiers allowing loan amounts up to $250,000. During the evaluation period, the bank originated/renewed 48 Easy Access LOC loans in the AA totaling $3.2 million.

MB offers Small Business Overdraft Protection (ODP), a product designed to offer micro businesses a safety net for periods of short-term cash flow constraint. The products assist the businesses in limiting overdraft fees or returned check charges that may be imposed by a vendor or other party. There is no application, closing or annual fees for this product. The maximum commitment varies between $5,000 to $10,000. During the evaluation period, the bank originated five ODP lines in the AA totaling $41,000 million.

Wintrust Community Bank Down Payment Program is a down payment and closing cost assistance program for LMI homebuyers funded jointly by the community bank charters under WFC. The program helps LMI homebuyers achieve their dream of homeownership. The assistance is provided with $2,000 grants paid on behalf of the borrower at the time of closing on first mortgage financing for the home purchase and is fully forgiven at closing. Borrowers must have annual household income at or below 80 percent of HUD median income where the property is located.

INVESTMENT TEST

The bank's performance under the Investment Test in Michigan is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Grand Rapids CSA was excellent.

The bank had an excellent level of qualified investments, including grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibited excellent responsiveness to credit and community development needs. The institution occasionally used innovative and/or complex investments to support CD initiatives.

Table 4: Qualified Investments										2021-2025
Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Grand Rapids CSA	8	3,035	197	36,315	205	97.6	39,350	91.0	0	0
Broader Statewide or Regional Area	2	1,623	3	2,202	5	2.4	3,825	9.0	0	0
Total	10	4,658	200	38,517	210	100	43,175	100	0	0

*Data is from May 25, 2021 – December 31, 2025

The dollar volume of current- and prior-period investments represented 11.1 percent of tier 1 capital. MB had 205 qualified investments and grants in AA totaling $39.4 million. Of these qualified investments and grants, $29.1 million (74 percent) supported affordable housing, $9.7 million (24.5 percent) supported community services targeted to LMI individuals and $589,000 (1.5 percent) supported economic development activities.

The following are examples of qualified investments in the AA:

- The bank invested $12 million in a LIHTC fund supporting affordable multifamily housing development in Ottawa County. The investment financed a 52-unit residential project with essential amenities like fully equipped kitchens, E-call systems, and on-site management, designed for LMI households earning 30 to 80 percent of the area median family income (MFI). The development includes 11 units for adults with disabilities, 11 for tribal nation members, and 11 Section 8 units, addressing a primary community development need and demonstrating responsiveness to LMI individuals and families.

- The bank invested $4.4 million in a mortgage-backed security (MBS) during the evaluation period, secured by three multifamily properties located within Kent and Ottawa counties. These properties include developments providing Section 8 subsidized housing for seniors aged 62 and older, including those requiring accessible units. They offer supportive environments with resident services and community activities to enhance quality of life. In total, the investment supports 128 Section 8 subsidized affordable housing units for LMI seniors, addressing a primary community development need and demonstrating responsiveness to the needs of LMI seniors.

- The bank invested $1 million in an MBS, supporting a 146-unit affordable housing development in Kent County. The property serves families earning up to 60 percent of the area MFI, with most units under a long-term Housing Assistance Payments contract. This investment provides crucial affordable housing for LMI individuals and families.

Examples of qualified grants in this AA include:

- The bank provided a grant of $20,000 to a nonprofit organization that provides affordable housing, counseling, and medical care for homeless individuals with mental health or addiction challenges. The organization partners with community providers to offer medical and psychiatric care at no cost, helping clients re-enter society safely and productively. The grant supports housing stability, health services, and long-term community reintegration for LMI individuals within the bank's AA.

- The bank provided a grant of $10,000 to a nonprofit organization that enables LMI individuals and families to achieve homeownership. The organization offers affordable housing builds, financial education, and sweat equity opportunities to help residents attain the American dream of homeownership. Additionally, the organization operates a ReStore that provides low-cost tools, home improvement items, and furniture to the community, including LMI residents within the bank's AA. The grant supports housing access, financial education, and community resources for LMI families.

- The bank provided a $5,000 grant to a nonprofit organization offering no-interest home repair services, disability accessibility improvements, and educational programs for LMI homeowners. Services include ramp construction, installation of safety features like grab bars and handrails, and other modifications to enhance safety and accessibility. The organization prioritizes LMI residents in areas of highest need within the bank's AA. This grant supports safe, accessible, and affordable housing for LMI homeowners.

- The bank provided a grant of $5,000 to a nonprofit therapeutic riding center that serves LMI clients with developmental, physical, and mental health challenges. The organization is PATH-certified and offers grant and scholarship programs to provide reduced-cost or no-cost horse therapy services, which support physical strength, socialization, anxiety management, and speech development. Many clients rely on fixed Social Security incomes. The grant supports health, wellness, and therapeutic services for LMI individuals within the bank's AA.

Broader Statewide Regional Qualified Investments

Because the bank was responsive to CD needs and opportunities in its AA, examiners considered investments in the broader statewide and regional areas that include the bank's AA but do not have a purpose, mandate, or function to specifically serve the AA.

These investments amounted to approximately $3.8 million. During the current evaluation period, the bank invested $2 million in a LIHTC fund supporting affordable housing initiatives. Additionally, the bank purchased a $200,000 bond issued by a town in Kalamazoo County, where the median family income is below the moderate-income level for the MSA. The bank also awarded a grant to an organization providing community services to LMI individuals and families. Prior period investments totaled $1.6 million, including contributions to LIHTC funds for affordable housing development. Together, these investments and grants had a neutral impact, supporting the Investment Test conclusion.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full scope review the bank's performance in the Grand Rapids CSA was adequate.

Retail Banking Services

Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the institution's AA.

Table 5: Distribution of Branch Delivery Systems														2024 - 2025
Assessment Area	Deposits	Branches								Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)						% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA		Low	Mod	Mid	Upp	NA
Grand Rapids CSA	100.0	25	100.0	0.0	8.0	56.0	36.0	0		3.7	14.8	47.7	32.9	0.9
Total	100.0	25	100.0	0.0	8.0	56.0	36.0	0		3.7	14.8	47.7	32.9	0.9

Source: FFIEC File - 2024 Census
2025 Bank Data
Due to rounding, totals may not equal 100.0%

The percentage of the bank's branches in low-income geographies was significantly below the percentage of population living within those geographies. The bank had no branches in low-income geographies. The percentage of the bank's branches in moderate-income geographies was below the percentage of population living within those geographies.

MB provided alternative delivery systems in addition to traditional service delivery methods. These included deposit-taking ATMs, telephone banking, online banking, remote deposit capture, and mobile banking options. The bank also offered flexible deposit products and retail services, including Money Smart Checking and Savings accounts. The bank operated 26 deposit-taking ATMs, including three in moderate-income geographies. Since the last examination, MB opened one ATM in its AA located in a moderate-income CT within a community center to support LMI individuals.

Table 6: Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Grand Rapids CSA	0	1	0	0	-1	0	0
Total	0	1	0	0	-1	0	0

01/01/2021 – 12/31/2025 Bank Data.

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. Since the last examination, MB closed one branch in its AA located in a middle-income census tract.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly LMI geographies and/or individuals. Servies offered and branch hours are comparable among locations regardless of the income level of the area.

Community Development Services

The institution provided a relatively high level of CD services.

During the evaluation period 164 bank employees from various lines of business partnered with 69 organizations and contributed a total of 1,746 hours supporting LMI individuals and families in the AA. These included employees holding leadership positions as board or committee members for 36 organizations that promote affordable housing, home ownership education, community services, technical assistance to small businesses, economic developments, and financial education to LMI communities and individuals within the AA.

The following are examples of CD services provided in the AA:

- One employee dedicated 25 hours as a board member for a nonprofit that assists low-income homeowners with essential repairs and support. The organization strengthens communities by offering services including accessibility modifications, DIY remodeling classes, and financial coaching, focusing on veterans and vulnerable groups. The organization served over 28,000 households in West Michigan, funded by grants and donations.

- One employee served 15 hours as a board member for a nonprofit organization that provides child development services in the Holland, MI area. The organization serves over 400 children across multiple locations in Ottawa County, MI. Its programs are partially funded by federal assistance and family contributions, offering free full-day services to low-income families with children aged three to five. This support helps children thrive and gives parents peace of mind while they work.

- One employee served seven hours as a board member for a certified development company that helps small businesses access long-term, fixed-rate financing. Recognizing their role as innovators and job creators, the organization supports growth through the SBA 504 Loan Program. This program enables businesses to secure financing for commercial real estate and equipment with low down payments and competitive rates, reducing lender risk and promoting economic development in communities.

<u>FDIC Money Smart Program</u>

The bank utilizes the FDIC Money Smart program to educate individuals throughout the community on the benefits of financial literacy. The bank has over 50 team members certified to facilitate the financial education sessions. Additionally, utilizing the program the bank developed a program called Teen Talk$ within branch locations. The bank utilizes material for teenage children within the community with sessions including pizza and a drink. Sessions are held across the AA throughout the year, and parents are encouraged to attend.

Furthermore, the bank developed a reading project where employees read "Wimee Learns About Money" book to classroom groups and or other small groups. This covers how to manage money through giving, savings, and spending. The project kicks off each semester and began in early 2024.

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:	01/01/2021 to 12/31/2025 for Lending Test 05/25/21 to 12/31/2025 for Community Development Activities	
Bank Products Reviewed:	HMDA-reportable home mortgage loans CRA-reportable small business and small farm loans Community Development-eligible loans, investments, services	
Affiliate(s)	**Affiliate Relationship**	**Products Reviewed**
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	**Type of Exam**	**Other Information**
State of Michigan		
Grand Rapids – Wyoming, MI, CSA (266)	Full-scope	• Grand Rapids-Wyoming-Kentwood, MI MSA (2434) Full Kent (081) & Ottawa (139) Counties MI • Full Allegan County (005), MI

Appendix B: Summary of State Ratings

RATINGS MACATAWA BANK, NA				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/ Rating
Macatawa Bank, NA	Outstanding	Outstanding	Low Satisfactory	Outstanding
State:				
Michigan	Outstanding	Outstanding	Low Satisfactory	Outstanding

(*) The Lending Test is weighted more heavily than the Investment and Service Tests 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 of this title, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (10) and (13) of this title.

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 loans are treated the same 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** - 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 AA.

Table 10. **Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to $1 million) originated and purchased by the bank to businesses with revenues of $1 million or less to: 1) the percentage distribution of businesses with revenues of greater than $1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

Table 11. 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. 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 AA.

Table 12. 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 $500,000) 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 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2024 - 2025**

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
Grand Rapids CSA 2025	582	117,887	100.00	26,764	1.31	0.69	1.90	11.16	8.08	12.32	48.99	41.75	48.36	37.54	48.97	36.66	1.00	0.52	0.75
Total	**582**	**117,887**	**100.00**	**26,764**	**1.31**	**0.69**	**1.90**	**11.16**	**8.08**	**12.32**	**48.99**	**41.75**	**48.36**	**37.54**	**48.97**	**36.66**	**1.00**	**0.52**	**0.75**

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2025 Bank Data, 2024 HMDA Aggregate Data, "0" 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 **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
Grand Rapids CSA 2023	1,157	256,604	100.00	64,551	1.61	0.61	2.23	12.01	5.45	13.40	49.97	45.72	48.79	35.40	47.97	34.80	1.00	0.26	0.77
Total	**1,157**	**256,604**	**100.00**	**64,551**	**1.61**	**0.61**	**2.23**	**12.01**	**5.45**	**13.40**	**49.97**	**45.72**	**48.79**	**35.40**	**47.97**	**34.80**	**1.00**	**0.26**	**0.77**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "0" 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 **2021**

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
Grand Rapids CSA 2021	659	182,185	100.00	65,913	1.76	0.61	1.85	10.87	6.68	11.53	55.17	53.11	52.08	32.20	39.61	34.53	0	0	0
Total	**659**	**182,185**	**100.00**	**65,913**	**1.76**	**0.61**	**1.85**	**10.87**	**6.68**	**11.53**	**55.17**	**53.11**	**52.08**	**32.20**	**39.61**	**34.53**	**0**	**0**	0

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "0" 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 - 2025
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
Grand Rapids CSA 2025	582	117,887	100.00	26,764	17.09	8.42	7.52	17.32	20.45	21.41	22.94	23.02	23.31	42.65	40.21	36.74	0	7.90	11.02
Total	**582**	**117,887**	**100.00**	**26,764**	**17.09**	**8.42**	**7.52**	**17.32**	**20.45**	**21.41**	**22.94**	**23.02**	**23.31**	**42.65**	**40.21**	**36.74**	0	**7.90**	**11.02**

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2025 Bank Data, 2024 HMDA Aggregate Data, "0" 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
Grand Rapids CSA 2023	1,157	256,604	100.00	64,551	17.52	8.90	9.36	17.64	19.79	22.64	23.20	24.29	23.65	41.64	43.13	33.87	0	3.89	10.48
Total	**1,157**	**256,604**	**100.00**	**64,551**	**17.52**	**8.90**	**9.36**	**17.64**	**19.79**	**22.64**	**23.20**	**24.29**	**23.65**	**41.64**	**43.13**	**33.87**	0	**3.89**	**10.48**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "0" 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																			2021
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
Grand Rapids CSA 2021	659	182,185	100.00	65,913	18.25	6.83	8.35	17.06	19.73	20.82	22.11	24.58	23.46	42.58	43.85	36.36	0	5.01	11.01
Total	**659**	**182,185**	**100.00**	**65,913**	**18.25**	**6.83**	**8.35**	**17.06**	**19.73**	**20.82**	**22.11**	**24.58**	**23.46**	**42.58**	**43.85**	**36.36**	0	**5.01**	**11.01**

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "0" 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 - 2025
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
Grand Rapids CSA 2025	1,039	257,880	100.00	21,017	2.05	1.73	1.52	15.79	19.35	14.08	43.51	41.00	41.91	37.92	37.34	41.97	0.73	0.58	0.52
Total	**1,039**	**257,880**	**100.00**	**21,017**	**2.05**	**1.73**	**1.52**	**15.79**	**19.35**	**14.08**	**43.51**	**41.00**	**41.91**	**37.92**	**37.34**	**41.97**	**0.73**	**0.58**	**0.52**

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2025 Bank Data, 2025 Dunn & Bradstreet SBSF Demographics, 2024 CRA Aggregate Data, "0" 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
Grand Rapids CSA 2023	808	279,597	100.00	39,365	2.14	1.73	1.88	16.06	17.95	15.20	46.40	50.12	44.45	34.70	29.83	37.86	0.70	0.37	0.61
Total	**808**	**279,597**	**100.00**	**39,365**	**2.14**	**1.73**	**1.88**	**16.06**	**17.95**	**15.20**	**46.40**	**50.12**	**44.45**	**34.70**	**29.83**	**37.86**	**0.70**	**0.37**	**0.61**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "0" 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																			2021
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
Grand Rapids CSA 2021	1,336	223,602	100.00	22,182	3.11	2.25	3.22	13.39	13.55	12.96	49.25	54.64	48.83	34.25	29.57	34.99	0	0	0
Total	**1,336**	**223,602**	**100.00**	**22,182**	**3.11**	**2.25**	**3.22**	**13.39**	**13.55**	**12.96**	**49.25**	**54.64**	**48.83**	**34.25**	**29.57**	**34.99**	0	0	0

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 Dunn & Bradstreet SBSF Demographics, 2021 CRA Aggregate Data, "0" 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 - 2025
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**
Grand Rapids CSA 2025	1,039	257,880	100.00	21,017	84.38	33.40	52.17	5.30	52.36	10.31	14.24
Total	**1,039**	**257,880**	**100.00**	**21,017**	**84.38**	**33.40**	**52.17**	**5.30**	**52.36**	**10.31**	**14.24**

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2025 Bank Data, 2025 Dunn & Bradstreet SBSF Demographics, 2024 CRA Aggregate Data, "0" 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**
Grand Rapids CSA 2023	808	279,597	100.00	39,365	81.66	21.91	49.87	6.87	78.09	11.47	0
Total	**808**	**279,597**	**100.00**	**39,365**	**81.66**	**21.91**	**49.87**	**6.87**	**78.09**	**11.47**	0

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "0" 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											2021
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**
Grand Rapids CSA 2021	1,336	223,602	100.00	22,182	85.22	11.83	44.59	6.09	28.52	8.69	59.66
Total	**1,336**	**223,602**	**100.00**	**22,182**	**85.22**	**11.83**	**44.59**	**6.09**	**28.52**	**8.69**	**59.66**

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 Dunn & Bradstreet SBSF Demographics, 2021 CRA Aggregate Data, "0" data not available.
Due to rounding, totals may not equal 100.0%

Table 11: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2024 - 2025
Assessment Area:	Total Loans to Farm				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate
Grand Rapids CSA 2025	37	9,402	100.00	381	0.70	0	0	7.84	0	3.15	48.02	32.43	50.92	43.05	67.57	45.67	0.38	0	0.26
Total	**37**	**9,402**	**100.00**	**381**	**0.70**	0	0	**7.84**	0	**3.15**	**48.02**	**32.43**	**50.92**	**43.05**	**67.57**	**45.67**	**0.38**	0	**0.26**

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2025 Bank Data, 2025 Dunn & Bradstreet SBSF Demographics, 2024 CRA Aggregate Data, "0" data not available.
Due to rounding, totals may not equal 100.0%

Table 11: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022 - 2023
Assessment Area:	Total Loans to Farm				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate
Grand Rapids CSA 2023	39	9,773	100.00	776	0.56	0	0.26	8.29	0	5.15	50.63	41.03	55.67	39.83	58.97	38.27	0.70	0	0.64
Total	**39**	**9,773**	**100.00**	**776**	**0.56**	0	**0.26**	**8.29**	0	**5.15**	**50.63**	**41.03**	**55.67**	**39.83**	**58.97**	**38.27**	**0.70**	0	**0.64**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "0" data not available.
Due to rounding, totals may not equal 100.0%

Table 11: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2021
Assessment Area:	Total Loans to Farm				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate
Grand Rapids CSA 2021	29	7,045	100.00	423	1.03	0	2.13	5.89	10.34	3.07	56.38	62.07	60.76	36.70	27.59	34.04	0	0	0
Total	**29**	**7,045**	**100.00**	**423**	**1.03**	0	**2.13**	**5.89**	**10.34**	**3.07**	**56.38**	**62.07**	**60.76**	**36.70**	**27.59**	**34.04**	0	0	0

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 Dunn & Bradstreet SBSF Demographics, 2021 CRA Aggregate Data, "0" data not available.
Due to rounding, totals may not equal 100.0%

Table 12: Assessment Area Distribution of Loans to Farms by Gross Annual Revenue												2024 - 2025
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Grand Rapids CSA 2025	37	9,402	100.00	381	95.73	37.84	56.43	3.19	59.46	1.08	2.70	
Total	**37**	**9,402**	**100.00**	**381**	**95.73**	**37.84**	**56.43**	**3.19**	**59.46**	**1.08**	**2.70**	

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2025 Bank Data, 2025 Dunn & Bradstreet SBSF Demographics, 2024 CRA Aggregate Data,” 0" data not available.
Due to rounding, totals may not equal 100.0%

Table 12: Assessment Area Distribution of Loans to Farms by Gross Annual Revenue												2022 - 2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Grand Rapids CSA 2023	39	9,773	100.00	776	94.36	25.64	52.84	4.18	74.36	1.46	0	
Total	**39**	**9,773**	**100.00**	**776**	**94.36**	**25.64**	**52.84**	**4.18**	**74.36**	**1.46**	0	

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "0" data not available.
Due to rounding, totals may not equal 100.0%

Table 12: Assessment Area Distribution of Loans to Farms by Gross Annual Revenue												2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Grand Rapids CSA 2021	29	7,045	100.00	423	94.97	41.38	48.23	3.62	58.62	1.41	0	
Total	**29**	**7,045**	**100.00**	**423**	**94.97**	**41.38**	**48.23**	**3.62**	**58.62**	**1.41**	0	

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 Dunn & Bradstreet SBSF Demographics, 2021 CRA Aggregate Data, "0" data not available.
Due to rounding, totals may not equal 100.0%